

INQUIRY INTO SYDENHAM-BANKSTOWN LINE CONVERSION

Organisation: Sydenham to Bankstown Alliance

Date Received: 13 October 2019



Submission by Sydenham to Bankstown Alliance into the Legislative Council Inquiry into the Sydenham to Bankstown Line conversion

Thank you for the opportunity to make a submission to the Sydenham to Bankstown Inquiry. The Sydenham to Bankstown Alliance (SBA) is made up of community groups opposed the conversion of the Sydenham to Bankstown line and the proposed overdevelopment of the Sydenham to Bankstown Urban Renewal Corridor Strategy (SBURCS). The SBA is not opposed to the construction of more rail lines. We support the construction of the Metro to parts of Sydney that do not currently have a rail service. The SBA believes that the best way to provide the transport network Sydney needs to make it a 30 minute city is to build new rail lines not convert existing lines.

The community groups that are part of the SBA are: Save Dully Action Group, Hurlstone Park Association, Marrickville Residents' Action Group, Keep Our Area Suburban, Friends of Erskineville, the Cooks River Valley Association, Save Marrickville, Canterbury Residents Action Group, Save the T3 and the Mudcrabs (Cooks River Eco Volunteers)

Peter Olive,

Sydenham to Bankstown Alliance

Contents

Executive summary	3
a) The adequacy of the business case and viability of Metro	5
b) The consideration of alternatives for improving capacity and reducing congestion	14
c) The factors taken into account when comparing the alternatives and the robustness of the evidence used in decision-making	17
d) Whether metro is a suitable means of transport over long distances	21
e) The consultation process undertaken with, and the adequacy of information given to, community, experts and other stakeholders	23
f) The impact on the environment and heritage conservation	26
g) Any lobbying, political donations or other influence of the public or private sector in relation to making that decision	35
h) The tender process for appointing private operators	36
i) The contractual arrangements entered into in respect of the project	38
j) The adequacy of temporary transport arrangements during the conversion process, including for people with a disability	39
k) The impact on the stations west of Bankstown	45
l) Any related matter	47

Executive summary

Analysis of patronage based on figures released by Transport for NSW late in 2018 clearly shows that the Bankstown line is not a priority for Metro conversion. Removing the line with the least patronage from the Sydney Rail network is also the least effective way of addressing the City Circle bottleneck.

No one in the Sydenham to Bankstown corridor is against more frequent services, newer trains or increasing the capacity of the Sydney Trains network. The Sydenham to Bankstown Alliance has always argued for more rail lines, not less: rail to suburbs that are not currently served by rail. Surely it makes more sense to build new lines rather than convert existing ones?

The question, as Infrastructure Australia notes, is the quantitative comparison of plausible alternatives to Metro conversion. Alternatives such as new (not converted) rail lines beyond Sydenham, or digital systems upgrades to increase service frequency across the rest of the Sydney Trains network do not appear to have been considered by the NSW Government.

As an existing rail line and a brownfield site for development Metro Southwest from Sydenham to Bankstown is a radically different proposition to Metro Northwest which is a new rail line opening up new sites for development. The rail plus property model only stacks up where there is a new rail line.

Given this, we seek the following outcomes from your inquiry:

1. That the committee recommend that the Sydenham to Bankstown T3 conversion not proceed due to a range of negative impacts, including the:
 - Waste of scarce public funds converting existing rail services
 - Lack of transparency and genuine consultation & democratic decision making
 - Damage to the reliability of the Sydney Trains network
 - Significant impacts on commuters west of Bankstown
 - Unsuitability of the Metro for long journeys
 - Loss of heritage, character and liveability impacts for communities along the corridor
 - Impact on students travelling to Sydney University
 - Adverse impact on commuters using St Peters and Erskineville stations
 - Reduction in seating per train from 896 seats to only 378 seats.
2. That an alternate Metro route beyond Sydenham be considered and recommended, to service areas currently without rail services, with special regard to the F6 corridor. Alternately, stop the Metro at Sydenham.
3. That the government release the full business case to justify the Metro and the cost benefit analysis, as recommended by the Productivity Commission.
4. Expert advice and concerns from experienced Rail experts regarding digitalising the signalling the existing system should be heeded and acted upon to avoid wasting limited public funds.

However, should the Metro be approved we ask that:

1. An embargo be placed on any planning “upzonings” until after the completion of the Metro Line and other infrastructure needed for increased population densities is in place.
2. The government consults early with communities regarding station precinct design. This has been promised but has not yet eventuated.
3. The government guarantee that promises made in the PIR especially in relation to preservation of railway heritage are honoured and not resisted should design difficulties present themselves. This includes preservation of station buildings, platforms, station entrances and booking offices.
4. The full temporary transport plan is released
5. The franchising to a private operator should not be supported as it has not worked in Newcastle or Melbourne and should not be implemented for the Metro.
6. The impacts of Climate Change be given greater consideration in planning for design, contingency plans for weather events and for the running of the Metro, and that flooding strategies should address in detail the existing flood risk & anticipated flood management system requirements to service future catchment conditions.
7. There needs to be much more genuine consultation and co-operation with State planning, local councils and communities along the corridor at the planning stages.
8. A full heritage/character appraisal of the corridor is completed before the project goes ahead.
9. The Inner West Line (City to Liverpool via Regents Park and City to Bankstown via Regents Park) be restored as a matter of urgency

a) The adequacy of the business case and viability of Metro

The summary business case for the Sydney and Southwest Metro (which includes the Sydenham to Bankstown conversion) is a seriously flawed document, which should be the subject of a detailed investigation by your inquiry.

The business case - released only in summary form in 2016¹ - claims that the project City & South-West Metro (of which the Bankstown Line extension is part) will have \$1.53 of benefits for every \$1 of costs. Given the redacted numbers in the business case (and the fact the full business case has not been released) it is impossible to know how this figure was calculated.

However, what can be said is that the business case actually articulates just under \$13 billion of economic benefits for the project. Assuming that the Metro extension will cost \$12 billion (the mid-point between the upper and lower cost estimates), this represents a benefit cost ratio of barely 1:1 – not 1.53:1

Even if the benefit cost ratio is somehow correct, the business case appears to have grossly over-inflated benefits and under-estimated the costs. At the very least, it provides no explanation of how the benefits have been calculated.

Peter Martin, journalist and ex-Treasury official, has highlighted internal Transport for NSW emails from an analyst complaining that business cases were as good as completed without access to the numbers. Martin also notes the questionable types of 'benefits' used to inflate positive cost benefit ratios including patronage, time savings and travel time reliability in addition to being selective about the proposed transport project is compared with². The Metro City and Southwest contains all these faults.

Many of the business case statistics on growth in population, employment, households and dwellings used to justify the project are across the whole of Sydney not the Metro City and Southwest Corridor let alone anything specific for the Sydenham to Bankstown section.

A related challenge for the Inquiry is confirming what the Sydenham to Bankstown line conversion will cost.

Minister Constance in a press release dated 6 April 2018 stated that "The expected metro conversion of the line from Sydenham to Bankstown will cost less than \$1 billion...".

We will now point out some of the flawed analysis in the 2016 business case:

Is there a final endorsed business case?

While a heavily truncated 2016 Summary Business Case has been released, access to the full and final Business Case has been refused as it is considered Cabinet-in-confidence (GIPA 20M-0007).

It is also unclear whether any revised business case was prepared to capture the major changes to the Metro Southwest project scope in the government's Preferred Infrastructure Report. These changes were at the Government's request and not due to any external factors beyond its control meaning. NSW Treasury policy documents indicate

¹ <https://www.sydneymetro.info/sites/default/files/Sydney%20Metro%20CSW%20Business%20Case%20Summary.pdf>

² <https://www.smh.com.au/opinion/the-fake-economics-cookbook-how-to-make-bad-transport-projects-look-good-20171122-gzqd3x.html>

that these discretionary changes require further analysis rather than a simple Parameter and Technical Adjustment³.

We do know that in May 2017 additional analysis was undertaken on the overall Sydney Metro City & Southwest for Infrastructure Australia. This analysis is also not public as access has been refused (GIPA 20M-0001). This GIPA application did identify that the analysis relied upon by Infrastructure Australia is considered a 'draft' and that a 'final version was not signed'.

This raises several questions about the robustness and accountability of the NSW Government's decision making around Metro Southwest and begs the question whether there is a final Business Case that captures the current project scope?

Metro Southwest may be another example like the Newcastle Light Rail⁴, Westconnex⁵ and Sydney Light Rail⁶ that indicates a systemic problem with NSW Government Business Cases and decision making.

The SBA urges the Committee to refer Metro Southwest to the NSW Auditor-General and to consider whether a public inquiry is needed into Sydney transport planning⁷.

Revenue and the rail plus property model

The 2016 business case offers some ambitious revenue figures based on rail patronage and development better suited to a greenfield site like Metro Northwest or Hong Kong.

A review by international consultancy firm McKinsey concludes that the rail plus property model only works for new rail lines.⁸ It therefore won't work for the Metro Southwest Sydenham to Bankstown where the vast majority of potential development sites are infill or brownfield sites. Any associated value uplift associated with the Bankstown line has largely been captured since 1909 when the rail line first went through.

The forecast rail network demand figures (pages 37 and 57 of the business case) are across Sydney and come with the caveat that actual line by line growth may vary considerably (p37). How reliable is the prediction that 100% of operating costs for Metro City and Southwest will be covered by fare revenue (p93)?

Fare revenue doesn't cover 100% of operating costs for train lines anywhere in North America, the UK or Europe.

Fare revenue greater than 100% of operating costs has been achieved in Hong Kong.

For Sydney the figures are much lower with just 27% of operating costs covered by fares and other charges⁹ making the Metro City and Southwest business case assumptions unrealistic.

³ https://www.treasury.nsw.gov.au/sites/default/files/pdf/TC14-28_Parameter_and_Technical_Adjustments_and_Measures_%28New_Policy%29.pdf

⁴ <https://www.newcastleherald.com.au/story/5807582/auditor-general-slams-nsw-government-over-newcastle-light-rail-decision/>

⁵ <http://www.altmedia.net.au/tunnel-vision-used-for-business-case/134653>

⁶ <https://www.smh.com.au/national/nsw/sydney-light-rail-cost-blows-out-to-at-least-2-7b-after-settlement-20190603-p51tvc.html>

⁷ <https://www.thefifthestate.com.au/urbanism/infrastructure/sydneys-transport-planning-flawed/>

⁸ <https://www.mckinsey.com/industries/capital-projects-and-infrastructure/our-insights/the-rail-plus-property-model>

⁹ <https://www.smh.com.au/national/nsw/billions-in-savings-proposed-for-state-s-transport-as-costs-soar-20190528-p51rv1.html>

The Metro business case includes \$3.1B in stamp duty (p89) at Net Present Value over the 38.5 year project. This figure is from a time when the NSW Government was actively promoting ambitious housing targets through the Sydenham to Bankstown Urban Renewal Corridor yet there has since been a significant downturn in housing approvals¹⁰ making the stamp duty target questionable.

The only other option is development over the rail line or in the immediate station precinct which is the MTR Hong Kong model.

What level of development does Metro Southwest propose for Bankstown line stations?¹¹

Contingency / Risk management

The Productivity Commission 2017 five yearly review¹² identified that major infrastructure projects have an average 26% cost blow out. If a likely actual cost of \$15B is used for Metro City and Southwest then the cost benefit ratio becomes negative.

A cost of \$15B may be conservative as recent experience with Sydney light rail costs almost doubling from the initial budget indicate that a cost blow out for Sydney Metro City and Southwest is highly likely. The Sydney light rail is also notable for the mispricings and omissions in the business case¹³ which may well have been prepared by the same team responsible for Sydney Metro.

Impacts of rail line shutdown

The business case (page 71) claims that the disruption impacts of shutting down the rail line for commuters will be just \$14 million.

At the time this figure was calculated (in 2016), it was intended that around 38.7 million trips would be disrupted as a result of eight weeks' worth of shutdowns each year, and a final six month shutdown.

If each of these trips, are delayed by an average of 30 minutes as a result of the line being shut down, and you value this amount of time as half the average hourly rate of \$38.30, then a more realistic impact figure is \$735 million.

Even if the delay is just 15 minutes per trip, which would seem unlikely, the amount of disruption is still \$367 million.

The \$14 million figure however values the inconvenience upon each of these 38.7 million trips as just 36 cents per trip, a figure which underlines the contempt which is being shown to Bankstown line commuters.

Road travel time savings

The business case outlines a range of benefits from the Metro relating to alleged road travel time savings. This includes \$1.4bn in "improvements in road user travel times" and \$350m due to "reduction in vehicle costs for road users" for existing residents (page 71),

¹⁰ <https://www.smh.com.au/politics/federal/they-re-out-of-ideas-greens-propose-stimulus-package-as-building-approvals-collapse-20190906-p52oni.html>

¹¹ <https://www.theguardian.com/cities/2019/mar/19/how-public-transport-actually-turns-a-profit-in-hong-kong>

¹² <https://www.pc.gov.au/inquiries/completed/productivity-review/report/productivity-review.pdf>

¹³ <https://www.smh.com.au/national/nsw/sydney-light-rail-cost-blows-out-to-at-least-2-7b-after-settlement-20190603-p51tvc.html>

and a further \$319m for “improvements in road user travel times” and \$178m for reduction in vehicle costs for future residents (page 72).

However, there is no available public evidence to suggest there will be road travel time savings as a result of the introduction of the Metro, and in fact, it is quite possible road travel time will get worse.

The EIS which accompanied the Metro in 2017 in fact said that urban renewal to accompany the Metro could cause increased road usage.

It said: “The demand for road travel is expected to increase into the future, including as a result of population growth and urban renewal initiatives outlined in the draft Sydenham to Bankstown Urban Renewal Strategy.”¹⁴ It later also said there is only the ‘potential’ for ‘reduced dependence on motor vehicles’.

In addition, the business case does not appear to take into account the increase road activity as a result of workers coming to the corridor to build the Metro, or the congestion impacts caused by road disruption during construction. This is despite the fact the 2017 EIS was very specific about increased congestion during the five-year construction period.

In regard to traffic impacts, the EIS says: “During construction, traffic congestion, travel delays, diversions, access and parking restrictions and alternative public transport arrangements may discourage some people from making some trips or access certain areas, cause increased stress levels in some people, and limit access to some areas.”

“This could also affect people’s ability to carry out their usual networking and social activities, impacting on community cohesion. These impacts would be particularly experienced by vulnerable groups (e.g. the elderly, people with disabilities and those from culturally and linguistically diverse backgrounds).”

This indicates that the above alleged road benefit is false.

Increased accessibility between origins and destinations

The business case books \$1,863m in benefits due to “travel time savings...generated through increased accessibility between particular origins and destinations as a direct result of Sydney Metro City & Southwest.” This is also incorrect. .

In regards to the accessibility question, Sydenham to Bankstown commuters will lose direct access to 21 stations, as a result of being cut out of the Sydney Trains network.

What are the 'significant travel time savings' associated with losing direct access to St Peters, Erskinvile, Redfern, Museum, Town Hall, Wynyard and Circular Quay stations?

For instance, Sydenham to Bankstown line commuters will no longer be able to get direct access to Circular Quay to catch a harbour ferry or access major cultural venues such as the Opera House or Museum of Contemporary Art.

Also gone will be direct access to Redfern to walk to the University of Sydney. In addition, commuters will lose direct access to stations west of Bankstown, including Lidcombe. Many services to Sydney Olympic Park start at Lidcombe.

¹⁴ Transport for NSW | Sydney Metro City & Southwest – Sydenham to Bankstown upgrade EIS | 11.15

In return, these commuters will gain direct access to 19 new stations, which means there is an overall net loss of direct access stations for commuters. Many of these new direct access stations are in the north-west of Sydney, which has little geographic community of interest with Bankstown line commuters and therefore are of limited benefit.

In addition, more than 17,000 commuters using eight stations west of Bankstown will be forced to change trains to reach the City Circle thanks to the introduction of the Metro.

Commuters travelling from Carramar, Villawood, Leightonfield, Chester Hill, Sefton, Berala, Birrong and Yagoona currently enjoy direct access to all stations on the City Circle – without needing to change at stations – via the T3 Bankstown line.

This will change under a Metro operation, causing inconvenience and reduced service levels for these commuters.

These commuters will now need to change from a Sydney Trains service to a Metro service at Bankstown to reach the city, or alternatively travel to Cabramatta or Lidcombe and change on to other Sydney Trains lines.

If the commuters choose to travel via the Metro, they may then need to change for a second time to reach a number of City Circle stations they can currently directly access, including Museum, St James, Circular Quay, Wynyard and Town Hall. This is because these five stations will no longer be directly accessed by the Metro operation.

In July 2015, former executives of State Rail and Rail Corp, John Brew, Ron Christie, Bob O'Loughlin and Dick Day, outlined the inconvenience to passengers west of Bankstown as one reason against the Metro rail operation.

These executives pointed out that commuters from Carramar, Villawood, Leightonfield, Chester Hill, Sefton, Berala, Birrong, Yagoona will need to change trains to get Metro services to the city. In addition, they argue services on the Illawarra line will be lengthened and inconvenienced as the Illawarra line will need to service St Peters and Erskineville.

On the travel time question, the Metro will actually have marginal travel time savings – and in some cases will be slower – when it comes to trips into the Sydney CBD. There are a number of reasons for this.

Firstly, the Metro will no longer stop at any of the existing City Circle stations (Museum, St James, Town Hall, Wynyard and Circular Quay) and will instead stop at new stations at Pitt St, Martin Place and Barangaroo.

This in particular will mean a slower trip into the northern end of the Sydney CBD, such as the Circular Quay area, given that both Wynyard and Circular Quay have been removed from the Bankstown Line. This means commuters will either need to change trains to access this area or walk from Martin Place station – both options are likely to take around five minutes.

Secondly, the Metro will be an all-stops service, which reduces the time travel benefits in particular for the western end of the corridor. For instance, the fastest train from Bankstown to Central (which is the 8:11am train) gets to Central in 27 minutes – one minute quicker than the Metro. Other morning fast trains from Bankstown get to Central in 30 minutes, which is just two minutes slower than the Metro.

What's more, the projected time for the Metro is based on 20 second dwell times at each station, which is very optimistic at busy stations. Dwell times currently average around 50 seconds at the busy stations. This raises some doubt about the Metro travel time predictions.

Table: How the Metro travel time to Circular Quay compares to the existing timetable

Station	Fastest train to Circular Quay travel time in 2017 timetable	Future travel time to Circular Quay (including 4-minute transfer at Central and then nine-minute trip on Sydney Trains service to Circular Quay)	Time difference
Bankstown	35	41	6 minutes slower
Punchbowl	36	39	3 minutes slower
Wiley Park	39	37	2 minutes quicker
Lakemba	30	35	5 minutes slower
Belmore	33	33	Same
Campsie	29	31	2 minutes slower
Canterbury	27	29	2 minutes slower
Hurlstone Park	24	27	3 minutes slower
Dulwich Hill	25	25	Same
Marrickville	23	23	Same

Infrastructure impacts

The business case is happy to book some major benefits in relation to increased development along the corridor. This includes \$1,157m in 'city shaping benefits' (including the "Increase in the value of the above transport benefits as a result of more residents and businesses locating along the transport corridor" and \$252m in 'land use impacts' including "more efficient land use in terms of infrastructure savings, health and sustainability benefits for with more residents and businesses locating along the transport corridor."

However, at the same time, the business case is not willing to sufficiently count, as impacts, the costs of delivering additional school, hospital, open space and other infrastructure for these increased residents.

In fact, in a perverse outcome, the government actually books a \$110 million benefit due to an infrastructure provision 'saving' due to the government's claim that there is less need to provide infrastructure to people living in high density communities in existing urban areas (see p73 of the business case).

The fact is that there is a need to provide additional infrastructure to any additional residents, and this should have been counted as a cost to government and therefore an impact.

Furthermore, the statement that the project would lead to an infrastructure provision 'saving' should be questioned. It assumes that there is spare infrastructure capacity along the corridor, when in fact this is not the case.

This was a significant issue during the debate over the Sydenham to Bankstown Corridor Urban Renewal Corridor Strategy, where the Department of Education submitted that it was unlikely to be able to fulfill its statutory obligations to deliver education services due to the massive unfunded increase in school-aged children in the corridor due to intense renewal. In addition, the Office of Sport submitted there was an inadequate level of open space to accommodate increased residents.

Safety incidents and fencing

The business case books \$221m in benefits due to "economic savings from a reduction in the average number of safety incidents per rail journey as a result of the Project having additional safety features, such as platform screen doors". (page 71), and elsewhere touts the improved safety of the new Metro (p57,p61) yet the summary financial analysis paints a different picture identifying an increased number of potential safety incidents per year with a dis-benefit (ie cost) of \$30m.

While the basis of this claim is not known, it is not necessarily borne out by present day events. Early indications from the operation of the North-West Metro support the dis-benefit conclusion as there has in fact been an increase in safety incidents since the North-West Metro began operating, in particular parents being separated from their children.¹⁵ If Metro was adequately staffed with drivers and guards it would be safer.

Concerns about Metro Southwest safety are also illustrated by the duplication of fencing. As part of the works for the T3 Bankstown Line metro upgrade as part of Sydney Metro City & Southwest, a permanent security fence will be installed inside the entire rail corridor. The fence will be 2.4 metres to 2.7 metres high formed primarily of welded steel mesh, however this is subject to final design.

¹⁵ <https://thenewdaily.com.au/news/state/nsw/2019/08/29/sydney-metro-kids/>

TfNSW has a Boundary Fences Standard (T HR CI 12160 ST) with Section 8.2 stating that a standard residential boundary fence is a hardwood timber paling fence that shall be 1800mm high. Current fencing along the corridor is 2 metres high and therefore exceeds this standard. Why then do residential properties require a second and new 2.4 to 2.7m permanent security fence?

Verbally Metro staff have confirmed that the driverless Metro Southwest is considered less safe, based on a risk assessment, than the current Bankstown line, hence the need for the duplicate fence.

Timeframe to assess benefits: Operational period

Without seeing the full business case including detail of the real, nominated and discounted cash flows (p93) used over the 38.5 years of the project it is impossible to assess the reasonableness of the assumptions and costings used to justify the project.

The business case books \$285m in “additional value that the Project’s assets will generate beyond the 30-year operational period in the analysis. Known as residual value, it is a proxy measure for the remaining benefits in long-term infrastructure projects.” (page 71).

It is not clear what this ‘30-year operational period’ is. This is the only time the term ‘operational period’ is mentioned in the business case.

With this in mind, it is very difficult to comment on this finding.

Construction impacts not counted

While the business case is happy to chalk up benefits when the Metro is in operation, it seems reluctant to acknowledge any impacts during the construction period. When the business case was written (in 2016), the construction period was set to be far more disruptive, compared to the amended project plan approved in 2018.

This included the demolition of platforms and reconstruction of bridges to allow the straightening of lines and shutting down the rail line for eight weeks a year and for six months in 2024. The current approved plan does not propose to alter platforms or remove overhead buildings.

In fact, across the business case, the following construction-related costs should have been included, but were not:

- Impacts on businesses during shutdown periods and increased road congestion during construction
- Reduced workforce productivity due to sleep reduction caused by noise
- Reduced productivity due to traffic impacts during the shutdown periods
- Reduced learning capacity of local schools due to noise
- Environmental impacts, including tree removal (see more below)
- Impacts on heritage and character as a result of development, including both through urban renewal and on station precincts (particularly the proposal in 2017 - now discarded - to remove historic overhead offices and some platform buildings.)

Overall, the business case talks up the operational benefits and seeks to dismiss the five-year construction impacts.

Questionable benefits

The business case offers an extensive menu of high value benefits (p26, p57) with no explanation of how they are costed. Some are questionable:

- What increased 'comfort' is associated with only 1 in 3 passengers on a full train having a seat instead of the current 3 in every 4?
- What are the 'health benefits' of high density living with limited access to open space?

As outlined in a recent seminar, there are significant concerns that many benefit cost analysis reports lack any real rigour or professional standards and many are simply made up. This is certainly the case with the business case for the City & South-West Metro.

b) The consideration of alternatives for improving capacity and reducing congestion

A critical issue with the Metro is that the NSW Government will be spending taxpayers money to replace one railway line with another railway line, while leaving many underserved parts of Sydney crying out for rail services.

According to current NSW Government estimates, the total cost of the Metro line is more than \$20 billion, of which the Metro City and South-West (which includes the section from Sydenham to Bankstown) will take up anywhere from \$11.5 billion to \$12.5 billion. The precise cost of converting the Bankstown line to a Metro operation has not been revealed, but would presumably be over the \$1billion mark.

While the spend on new lines is justifiable the costs associated with the Sydenham to Bankstown line, to convert a train service to suburbs that already have a train service, is not.

The concept of converting the Bankstown line, to build a rapid transit Metro, was first floated in a NSW Government discussion paper called Sydney's Rail Future, in 2012. It was released by, then Transport Minister and now Premier, Gladys Berejiklian.

This document proposed converting the Bankstown line (to both Lidcombe and Liverpool) as a single-deck Metro service. The Illawarra line was also proposed to be subject to this conversion. This document does not actually explain why the Bankstown line was chosen for this decision, nor does it analyse the disruption impacts as a result of doing this.

Sydney's Rail Future also includes an extremely limited (three-page) analysis of different strategic alternatives for the Sydney rail network, mainly looking at whether a Metro-style system should be introduced.

In October 2012, the 20-year State Infrastructure Strategy by Infrastructure NSW (the government's strategic infrastructure advisors) was released. The strategy reviewed Sydney's Rail Future and questioned the decision to run the Metro to Bankstown. It stated:

"The utilisation of rapid transit both south and west of the CBD appears sub-optimal. The current proposal will serve the Bankstown Line, which carries only 6,600 passengers in the peak hour, and part of the Illawarra Line which already has good access to the CBD via the Eastern Suburbs Line."

"By contrast the heaviest traffic flows outside the CBD occur on the six-track Main West Lines between Strathfield and Central. The development work undertaken on the West Metro project, indicated that this corridor through the Inner West could offer a strong market for rapid transit services."

This approach would provide high capacity metro-style services on the most congested part of the network from Strathfield to Chatswood via the CBD."

Despite this, the concept of converting the Bankstown line was then confirmed in the NSW Long Term Transport Master Plan, released in December 2012 – again without justification and without reference to Infrastructure NSW's concerns.

In 2014, the NSW Government announced its plan to sell electricity assets and then Premier Mike Baird directed Infrastructure NSW to update its State Infrastructure Strategy to “take into account” the Metro line extension to Bankstown.

In its revised strategy, released in November 2014, Infrastructure NSW recommended that \$7 billion be allocated to the Metro project from the sale of electricity assets but again does not outline any specific benefits from converting the Bankstown line.

It was only in the business case summary, released in October 2016, that specific claims were made that the Bankstown line “adds to Sydney’s big rail bottleneck” and “funnels trains on to the East Hills and Inner West line outside Central”, and therefore should be replaced by a separate Metro service.

As outlined in this paper, this business case is a highly flawed document, which fails to properly account for many of the impacts of the Bankstown line shutdown.

In short, there remains a critical lack of analysis of alternative options to the extremely destructive decision to shut-down the Bankstown line.

This view is shared by Inner West Council. In its submission to the EIS, the council states: “While investment in public transport is welcome, disappointment must be relayed with regard to the project not concentrating initially on areas that are currently unserved by public transport. (The EIS’) assessment of alternatives does not adequately explore how other areas that are not currently served by public transport could be served by the project.”

The council submission states that retaining an additional harbour crossing for the existing Sydney Trains network, rather than converting this crossing into a Metro service as is planned, “would achieve the same outcomes as Metro in terms of removing blockages from the City Circle and freeing up capacity.”

Meanwhile, four former senior Sydney Trains executives were revealed to have told the government in 2015 that the Metro to Bankstown was not the answer and did not deal with the issue of the highly constrained number of tracks between Central and Strathfield. “If the government had spent \$17 billion on upgrading the existing double-deck system by improving signalling and providing track amplification at critical pinch points, it would have got a better overall result,” the analysis by the four former rail chiefs said.

The former rail chiefs also said the “takeover” of an existing rail line between Sydenham and Bankstown for the government’s single-deck metro train project will remove “the relief valve for the network” and leave “no escape route”. “Any new system needs to add value by adding to existing capacity, not by taking away part of the existing network in the name of progress,” they said.

This has been further supported by an opinion piece in the SMH published by Dr Dick Day, a retired urban planner and senior manager of Sydney’s rail system. Dr Day said: “The Bankstown Line metro conversion represents a poorly thought out initiative that will incur considerable expenditure and disruption yet is incapable of being used to its full potential to relieve congestion on the rest of the network. For good measure it incurs further cost and operational complexity by relocating country trains from the Meeks Road Depot near Sydenham.”

“Fortunately, it is not too late to re-prioritise. Metro advocates have already identified the need for an additional line to Parramatta and beyond. That would indeed be a congestion buster and should be constructed instead of the Bankstown Line metro conversion.”

A similar view is stated by public transport lobby group Ecotransit to the Chatswood to Sydenham section of the Metro line, this money could be better spent on providing new public transport solutions for suburbs with limited connectivity, or improving signalling operations to speed-up the capacity of the current network, rather than cannibalising an existing line.

We agree with EcoTransit’s conclusion that “based on the information that has been presented to the public, one can reasonably conclude that the Sydney Metro, including the City & Southwest section, is not really about providing improved public transport. It is about providing development opportunities to developers, including MTR Corporation, and turning large tracts of Sydney into MTR’s version of Hong Kong.”

By converting the Bankstown line, NSW is squandering the once-in-a-century windfall gains presented by the sale of the State’s electricity assets and in doing so destroying communities along the corridor.

c) The factors taken into account when comparing the alternatives and the robustness of the evidence used in decision-making

Part of the NSW Government's strategy has been to link rail infrastructure construction with non-rail development in order to garner funds¹⁶. In some circumstances this may be justified. However, if the process becomes distorted, alternatives dismissed and the conversion of rail lines, or the selection of routes becomes a matter of how to deliver profitable projects to major development corporations, rather than the provision of the best, most needed rail services to make Sydney a 30 minute city, then there is a problem.

As mentioned in the above chapter, Infrastructure NSW questioned Sydney's Rail Future's decision to run the Metro to Bankstown. The foresight of the Infrastructure NSW position was borne out during the 2019 State Election. Both Major parties supported the Sydney Metro West and made it a top priority in the roll-out of Sydney's Metro network.¹⁷ Both dedicated \$3billion for its construction, though this falls way short of the \$18billion necessary to deliver the project.

Many people along the corridor have suspected that the government would receive considerable financial benefits coming from the upzoning of land along and above the Sydenham to Bankstown Corridor. This has been the model used to develop Martin Place and Pitt Street stations.¹⁸ Exploiting the connection between upzoning development potential along rail corridors and providing rail services is the *modus operandi* of Hong Kong based MTR Corporation, the company with operating rights of the Northwest Metro. MTR's business model is called "Rail plus Property" (R+P). The government provides MTR with land "development rights" at stations or depots along the route. MTR then pays the government based on the land's market value without the railway.¹⁹

Among communities in the Sydenham to Bankstown Corridor there is a fear that MTR will be given the rights to run the Southwest Metro and control over the development potential along the Sydenham to Bankstown corridor. This fear is all the greater as residents in the corridor had previously won a concerted battle to scrap the "Priority Precincts" that would have delivered relatively indiscriminate overdevelopment to their neighbourhoods.

Subsequent to the community victory over priority precincts the government enacted Transport Administration Amendment (Sydney Metro) Bill 2018 to "facilitate the development, implementation and operation of a metro in Sydney by constituting Sydney Metro as a corporation and to provide generally for the corporation's management and functions." One of its functions was "to facilitate and carry out the orderly and efficient development of land in the locality of metro stations, depots and stabling yards, and proposed metro stations, depots and stabling yards."²⁰

¹⁶ <https://www.sydneymetro.info/article/pitt-street-metro-station-become-city%E2%80%99s-newest-landmark> "As part of a value capture agreement on Sydney Metro, the NSW Government will receive \$369 million from the consortium for the air rights to develop the two buildings above the station."

¹⁷ <https://www.smh.com.au/national/nsw/old-crowded-trains-and-maxed-out-credit-will-the-sydney-metro-project-sway-voters-20190123-p50t1j.html>

¹⁸ <https://www.smh.com.au/national/nsw/macquarie-group-seals-deal-for-new-martin-place-metro-station-and-towers-20180912-p5038p.html> "Taxpayers are likely to bear only a small portion of the cost of a new \$378 million metro rail station underneath Sydney's existing Martin Place station, after the government completed a deal to sell the air rights above the station to Macquarie Group."

¹⁹ <https://www.mckinsey.com/industries/capital-projects-and-infrastructure/our-insights/the-rail-plus-property-model>

²⁰ <https://www.parliament.nsw.gov.au/bills/Pages/bill-details.aspx?pk=3500>

The flaws in this developer driven approach can be seen in the decision to select Waterloo, rather than Sydney University/Royal Prince Alfred (USyd/RPA) as the preferred route between Central and Sydenham. USyd/RPA is a major destination for Sydney with over 45,000 daily visits. Yet the government chose Waterloo as its preferred station, primarily for the ability of the site to yield greater residential densities. Linking USyd/RPA to the rail network would have been a boon for all Sydneysiders though this common-sense destination faltered on the inability of the site to provide a residential upzone and the money that flowed from it.

At the time the tension this caused in the government bureaucracy was succinctly put by SMH journalist, Jacob Saulwick. "The two options are at Sydney University and at Waterloo. The Sydney University option is understood to be favoured by some Transport for NSW bureaucrats, due to the tens of thousands of guaranteed passengers a day. But the Waterloo option is being pushed by the property development arm of the state government, UrbanGrowth NSW, as a catalyst for major apartment projects in the area."

²¹ He added, "The Waterloo option would also trigger the destruction, but possible replacement, of about 2000 housing commission apartments."

There may have been good planning reasons to build at Waterloo. However, it doesn't take much imagination to believe that building industry lobby groups would pressure governments to favour station locations that delivered multi-million dollar opportunities for construction contracts. This is especially the case when those who were high up in UrbanGrowth had been significant players in the world of corporate construction. Urban Growth CEO, Barry Mann had a combined 18 year career with Lend Lease and Stockland.

²² Further, it isn't difficult to believe that governments would want their coffers to keep filling up with stamp duty and other fees as a result of these developments. ²³

Most recently, after a number of big spending projects, the NSW government is running out of money. Its ability to fund a number of key infrastructure initiatives is being questioned. As recently as August the plans for the second stage of the Parramatta Light Rail was being put on the "back-burner" due to a shortage of funds. The NSW Labor member for Kogarah, Chris Minns, said, "If the government can't fund the project, then they can't build it and they must start being honest with residents and businesses along the route who thought they were getting light rail".

The second stage of the Parramatta Light Rail was to be built in the converted Carlingford heavy rail line and funded by a levy on associated urban density. According to the SMH, although the government had, "allocated funds for the entire \$2.4 billion cost of the first stage, it has yet to reveal what the second stage is set to cost and how it intends to pay for it." ²⁴ So far, the government has spent \$20 million on the second stage, and allocated just \$2 million this financial year. The total cost of the entire project was more than \$3.5 billion.

²¹ <https://ecotransit.org.au/wp/2015/12/01/sydney-metro-mysterious-flyer-pushes-rail-station-waterloo-sydney-university/>

²² <https://www.nsw.gov.au/your-government/the-premier/media-releases-from-the-premier/barry-mann-appointed-urbangrowth-ceo/>

²³ <https://www.theaustralian.com.au/nation/politics/property-slump-weighs-on-state-revenue-estimates/news-story/387a0f9bc7baa9f74633456678d1bcf7>

²⁴ <https://www.smh.com.au/national/nsw/levy-delay-leaves-funding-hole-for-parramatta-light-rail-second-stage-20190819-p52il9.html>

It cannot have escaped the government's attention that the catchment for the second stage of the Parramatta Light Rail is already serviced by rail. Decommissioning that service to put a different mode of rail transport in its stead may not be the best use of dwindling government resources. Clearly, the conversion of the Carlingford line has parallels with the conversion of the Sydenham to Bankstown line.

Like the Carlingford line the conversion of the Sydenham to Bankstown line was to go hand-in-hand with upscaling development potential. The development levels for the Sydenham to Bankstown corridor were to be set for the corridor under "Priority Precincts". This would have ceded considerable planning control to the NSW Government and away from the local councils. A total of 36,000 new homes were proposed along the corridor. After a concerted community campaign the Government relented and gave back ostensible planning control to the councils.

However, with the government's coffers so bare, the fear still remains that the Government will undo the previous victory of residents and reinstate greater density along the Sydenham to Bankstown corridor to pay for the conversion of the heavy rail service to a metro service. The Southwest Metro will become the Trojan horse for overdevelopment while overdevelopment will be the method by which the Trojan horse will be paid for.

The combined effects of the government's relative impecunity, coupled with the bi-partisan agreement that the Metro West is the priority for Sydney's rail, should be cause for the government to reassess the need for the Sydenham to Bankstown conversion to proceed. While there is no doubt the Metro will be built to Sydenham, it is a perfectly feasible option for the Metro line to terminate there. This potential was publicly exhibited in the environmental impact statement (EIS) for the Chatswood to Sydenham section of the Metro line canvasses this possibility.

The EIS stated that "should the construction time frames of this project (Chatswood to Sydenham section of the Metro) be advanced, there may be an opportunity to operate this project before completion of the Sydenham to Bankstown upgrade project. Should this occur, an additional track-turnback would be constructed between the Marrickville drive structure and Sydenham Station."²⁵

As with the mooted abandonment of the Parramatta Light Rail - Stage 2, it is perfectly legitimate for the government's priorities to change regarding the Sydenham to Bankstown line. The parallels between the two projects, where existing heavy rail lines are being cannibalised and converted into another form of rail, would make the de-prioritisation of both, appropriate.

Ironically, for residents living beyond Sydenham the effect of the Metro line, stopping at Sydenham would improve their access to other parts of Sydney. They would maintain their traditional services, most importantly to Redfern, Town Hall, Wynyard and Circular Quay, while being able to join the Metro at Sydenham and access the new City stations and the North Shore if they chose. Wider Sydney would have all the key features of a new Metro line – such as new North-West rail link, a new harbour crossing and new stops in the CBD – and access the Bankstown line as they always had.

If the major requirement for improving Sydney's rail network is to provide greater services to Parramatta via the Inner West then the best way to do that is to build a new line there. The Sydenham to Bankstown Alliance have always said the answer lies in the building of

²⁵ See page 179 at

https://majorprojects.affinitylive.com/public/7d700ce62a94273f90eeb15031f3f2f6/006%20Sydney%20Metro%20C2S%20EIS%20Chapter%2006%20Project%20Description_%20Operation.pdf

new railway lines to suburbs that don't currently have them, rather than converting existing lines in suburbs that already have them.

If the Government is unwilling to prioritise the MetroWest ahead of a Metro beyond Sydenham, it should consider other destination suggestions for extending the line. These include a new line from Sydenham to the airport then along the M6 corridor to provide additional capacity and a new public rail line to suburbs that don't currently have them.

d) Whether metro is a suitable means of transport over long distances

Despite an increased service frequency there will be less overall seats available for commuters on the new Metro line, when it opens in 2024, compared to the existing Bankstown line under the timetable which came into operation in late 2017. This makes this mode of transport less suitable for long distance travel.

This is because there will be less seats on the single-decker Metro train compared to the existing double-decker trains that run on the Bankstown line. Existing eight-car Waratah trains have 896 seats [2] – while the new Metro train will only have 378 seats. This represents a 60 per cent reduction in seating per train.

An initial calculation by the Sydenham to Bankstown Alliance shows that in 2024 the new six-car Metro trains will provide a potential 51,000 seats across the ten stations. This compares to a potential 53,000 seats, assuming all trains are Waratah Trains.

Commuters at Bankstown will be worst affected, seeing their potential seat capacity fall from 8,960 to 5,670 per hour. This raises the possibility that commuters at Bankstown will need to stand for their entire 28-minute journey, although this will be offset by the fact that they will be the first on the trains and therefore more likely to get a seat.

Campsie commuters will also see a significant decline in potential seat capacity under the new Metro service, compared to the existing service.

Given that Metro services appear to be all-stops services, the lack of seating will particularly impact commuters at the eastern end of the line, from Campsie to Sydenham.

Even the government's own business case acknowledges the lack of seating will have a negative impact on Metro commuters. It states: "Customers travelling on metro services are expected to experience some crowding dis-benefit as trains will be configured to accommodate a higher ratio of standing to seated passengers." By the way, the term "dis-benefit" is government code for "negative impact".

Table: Analysis of seat numbers before and after Metro

Station	Number of existing trains per hour in morning peak	Resultant potential seats per hour	Potential seats per hour under Metro service	Increase or decrease in number of seats
Bankstown	10	8,960	5,670	Decrease
Punchbowl	6	5,376	5,670	Marginal increase
Wiley Park	4	3,584	5,670	Increase

Lakemba	6	5,376	5,670	Marginal increase
Belmore	6	5,376	5,670	Marginal increase
Campsie	8	7,168	5,670	Decrease
Canterbury	4	3,584	5,670	Increase
Hurlstone Park	4	3,584	5,670	Increase
Dulwich Hill	6	5,376	5,670	Marginal increase
Marrickville	6	5,376	5,670	Marginal increase
Total seats		53,760	51,000	Decrease

A potential lack of seating means that people may not be as able to read or relax during their train journey, as they will be forced to stand, and it will be more difficult to look after small children. It could also make it more difficult for the elderly and disabled to find a seat.

On Metro trains, when trains are full, about one in three passengers will be able to be seated. This compares to Waratah trains where around three out of four passengers are seated.

e) The consultation process undertaken with, and the adequacy of information given to, community, experts and other stakeholders

The consultation process undertaken both for the original South-West Metro Environmental Impact Statement (EIS) (in 2017) and the Preferred Infrastructure Project (PIR) (in June 2018) were difficult. The hard copy documents weighed in excess of 25 kg. While 2 months was given for consultation the size of the documents made this timeframe less than adequate.

The Preferred Infrastructure Report and Submissions Report was released on 20 June 2018 and the first public consultation session had already been organized and advertised to occur as early as Saturday 23 June 2018 from 10am to 2pm at the Bankstown Arts Centre, hardly enough time for the community to have digested any material. The initial exhibition period of four weeks further rushed the consultation process. The PIR was 11cms thick and weighed approximately 7 kilograms.

Process Flawed with little consultation with key stakeholders

The consultation process was further flawed as key stakeholders such as shopkeepers, commuters and residents within a 300 metre radius of each of the railway stations between Sydenham to Bankstown were given scant information.

This meant they were poorly informed about during the conversion, the effects a single deck metro train with 35% seating capacity and 65% standing room, the loss of the direct city circle link and the loss of direct links to St Peters, Erskineville and Redfern. Redfern is of particular importance to Sydney University students who live in the corridor.

It appears that many of the issues raised by interested parties who made submissions to the EIS in 2017 and PIR in 2018 have remained unanswered or have been given scant explanation, post exhibition.

Information given to community skewed to promote the project

Information given to the community by Transport for NSW focussed on the potential advantages of the Metro project, but did not give adequate attention to the disadvantages.

For instance, a 27-page summary brochure released alongside the Preferred Infrastructure Report in 2018 ²⁶:

- Does not report on the fact that commuters will lose direct access to 20 stations as a result of the project, instead focussing on “new CBD connections” (see page 6)
- Only uses Central Station to calculate alleged travel time savings, to maximise these savings. It would have been more helpful to calculate the potential savings (and delays) to a range of destinations, particularly the northern end of the CBD (Circular Quay) which will now be far more inaccessible for commuters, along with Lidcombe and Redfern (see page 9).
- Says that stations west of Bankstown “will continue to be serviced by Sydney Trains” (see page 8) but doesn’t report on the disruption to these commuters from now having to change at Bankstown.
- Says the project will result in “reduced travel times” to key employment and education precincts (see page 5), which ignores the fact that the project will bypass Redfern, making it more difficult to access the University of Sydney.

²⁶ Sydenham to Bankstown Preferred Infrastructure Report Overview June 2018 by Sydney Metro

This calls into question the appropriateness of the proponent - particularly when it is a government body - being able to release biased information to the community.

Densely populated and ethnically diverse region

The Sydenham to Bankstown corridor was described by the NSW Department of Planning in its Sydenham to Bankstown Urban Renewal Strategy as, “highly urbanized and extends through one of Sydney’s most densely populated and ethnically diverse regions”.

Extra care should have been taken by the NSW Department of Transport in explaining the real impacts of the project to these diverse communities rather than provide them with glossy brochures full of spin and promotion.

Small Business Package not communicated

Of concern is the reference to the small business package in the exhibited documents which appear to have not been communicated to the shopkeepers and or landowners who will be directly impacted by the effects of construction of the conversion of the T3 line from heavy rail to Metro.

No information exists in relation to any compensation package. There is no information on the terms of funding, guidelines and the responsible authority.

In light of The NSW Department of Transport’s failure to adequately inform and compensate shopkeepers affected by the CBDES Light Rail project there can be little confidence that small business will fare any better with the Sydenham to Bankstown conversion.

Lack of consultation with schools P & C, community groups

There has been no consultation with local schools, P & C groups in relation to the conversion of the line and to the loss of the city circle link.

The loss of a direct route to Museum, St James and Circular Quay will impact on educator wanting to access institutions such as the Opera House, the Australian Museum, the Art Gallery of NSW, the Museum of Modern Art, the Botanical Gardens, Hyde Park and the War Memorial. This represents a loss to the local schools and community organisations who rely on the train line to gain access.

The omission of Bankstown Station and Metro Interchange in the PIR Overview

Information about Bankstown Station becoming an interchange between heavy rail and the Metro was omitted from the PIR Overview. The community should have been properly informed of the implications of modal change at Bankstown. Commuters will face a 400m walk when changing rail modes at Bankstown. Commuters from the Western section of the Sydenham to Bankstown Line: Villawood, Carramar, Birrong, Yagoona, Sefton, Berala, Chester Hill, and Leightonfield, will be greatly inconvenienced as they travel in both directions.

Lack of Consultation with West of Bankstown

Commuters and residents West of Bankstown were not consulted about the project from its inception and it has been left to community groups with limited funding and resources to inform the local communities and the commuters of the project and the effects on their

train travel. The SMH described these commuters as “the forgotten commuters of Sydney - set to have their direct train service to the CBD taken away from them”.²⁷

Specific information on seating and the Temporary Transport Plan was not made available to commuters during the exhibition periods. And the latter only provided after paid GIPA application.

Despite this lack of consultation the majority of submissions opposing the Preferred Infrastructure Report originated from west of Bankstown. However, there has been no effort made to reach out to the community or local groups such as Save T3 Bankstown Line and Restore Inner West Line about the project.

The NSW Government also needs to include Cumberland Council as a stakeholder given that Berala, Regents Park, Chester Hill and Lidcombe will also be impacted by the project

Temporary Transport Plan

The lack of consultation extends to the TTP. Commuters to the West of Bankstown did not have the benefit of knowing what alternative transport arrangements would be in place during shutdown periods, including the delays they would face. They were only presented with a series of options, which were under consideration.

Commuters are still unclear what alternative arrangements will be in place during shutdown periods, particularly the final 3-6 month shutdown.

It is alarming that the project was given planning approval, when this information - which goes to the heart of impacts to the community - was not publicly available either to residents or to the Department of Planning as the assessing authority.

In fact, this information is still not available - the only temporary transport plan that has been released is for the shutdown period proposed at the end of 2019 and in early 2020. Commuters are still none the wiser as to how their needs will be serviced during the horrendous six-month shutdown in 2024.

²⁷ SMH 24 November 2015

f) The impact on the environment and heritage conservation

Environment

The Metro Southwest will have a significant and negative environmental impact. The Government will build a second 13.5 km fine mesh security fence inside the rail corridor, in addition to the existing fencing. (in order to remove drivers from Metro trains) that will stop the movement of wildlife, while continuing to slash, whipper snip and spray exotic vegetation all because it won't consider planting suitable low maintenance native plants along the corridor in keeping with its own policy guidelines.

Metro Southwest should:

- Redesign or re-consider the need for 2.4 to 2.7m high fine mesh security fencing along the 13.5km rail corridor to ensure that wildlife is able to move between the corridor and neighbouring back yards and open space. The current security fence design has gaps too small for reptiles, frogs and other animals to pass through effectively walling them off inside the corridor. Metro Southwest should commit to using the Transport for NSW Boundary Fences Standard (T HR CI 12160 ST) which states at Section 6 that considerations relating to boundary fences include protection or enhancement of biodiversity and visual impact or amenity.
- Ensure that any vegetation removed or disturbed in the rail corridor be replaced by native vegetation consistent with the Sydney Trains Vegetation Management Guide that demonstrates that value of replacing weeds and exotic vegetation²⁸ and the Minister for Planning's Conditions of Approval for Sydenham to Bankstown that already includes the use of local indigenous species for revegetation activities at Station Precincts²⁹
- Commit to improving the biodiversity value of the landscaped rail corridor that links with the existing Greenway and is consistent with the Office of Environment and Heritage conservation management notes on Corridors and Connectivity³⁰: The Metro Southwest corridor landscaping process is a major opportunity to create a landscape scale and low maintenance biodiversity corridor linked to the existing Greenway from Dulwich Hill.

At present Metro Southwest plans propose a loss to the vegetation inside the project area with additional uncertainty around the landscaping being considered during the detailed design process that is currently underway. While remnant vegetation will be preserved, some 500 mature trees will be removed (original 900 less 390 reduction)³¹ and it looks likely they will be replaced outside of the rail corridor.

Environmental impacts, risks and missed opportunities for Metro Southwest include:

- Development impacts on the Cooks River and surrounding land
- Project footprint includes Council land
- Environmental assessment of Metro Southwest
- Replacement trees and landscaping in the corridor
- Missed opportunity to establish a biodiversity corridor and impact of fencing.

²⁸ (https://railsafe.org.au/data/assets/pdf_file/0007/31696/EMS-06-GD-0067-Vegetation-Management-in-the-Corridor.pdf)

²⁹ (See E57c: <https://majorprojects.accelo.com/public/4bea4c8a912bf2e24cd9e566d16138ee/Sydney%20Metro%20-%20Sydenham%20to%20Bankstown%20-%20Signed%20Instrument%20of%20Approval.pdf>)

³⁰ (<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Conservation-management-notes/corridors-connectivity-conservation-management-notes-110657.pdf>).

³¹ <https://www.smh.com.au/national/nsw/station-upgrades-on-bankstown-line-fast-tracked-under-revised-project-20180620-p4zmkx.html>

Development impacts on the Cooks River and surrounding land

We already know that storm water and sewerage are the major sources of pollution in the Cooks River, and that ageing Sydney Water infrastructure needs replacing and upgrading to cope with current developments. The Cooks River Alliance produced a report in 2016 analysing storm water management controls within the catchment and found that some of the poorest controls were in the pre-amalgamation Canterbury Council³². Without a clear NSW Government and local council commitment to implementing Water Sensitive Urban Design (WSUD) principles development enabled by Metro Southwest will make pollution in the Cooks River worse than it already is.

Open space and Canterbury Racecourse

With development also comes a need for community infrastructure including open space. Local development to date has not included any new passive or active green space in an area with an acknowledged shortage. For example Canterbury Council's recent S94A policy review indicates Council has the resources to purchase less than two hectares of land when the identified need for new open space is over 30 hectares³³ in that Council area alone. Proposed linear and pocket parks won't make a significant difference.

The one remaining site that could, at scale, address many community open space needs, including playing fields, is the 35 hectare Canterbury Racecourse. Yet NSW Government planning documents indicate that even this site is at risk of future development.

The Australian Turf Club has tried for several years to classify portions of Canterbury Racecourse as surplus land that can be developed, even going so far as to partner with Mirvac prior to any rezoning or planning approvals³⁴. If any Metro Southwest influenced amendment to the Canterbury Racecourse site is to be considered this should be to rezone it RE1 Public Recreation with a view to government acquisition creating much needed regional open space.

Greenway South West

While supporting active transport the SBA acknowledges the removal of the Greenway South West active transport proposal inside the rail corridor in favour of walking and cycling links outside the corridor. The Greenway South West was one of the more poorly thought through aspects of Metro Southwest and, assuming any land was available inside the rail corridor, would have involved removing green space by pouring an additional three hectares of concrete pathway.

Project footprint includes council land

The PIR proposal contain all of the same construction compounds and worksites both within and outside the rail corridor even though Metro is no longer proposing to replace the existing rail lines. The SBA understands from public consultations that the construction footprint remains unchanged as Metro Southwest still requires extensive cabling and fencing. This means that Metro Southwest will have a significant impact on Council owned vegetation. Examples in Hurlstone Park include the corner of Melford and Canberra St, Warwick reserve and the Parade (East of Garnet St)³⁵: all of which contain

³² <http://cooksriver.org.au/publications/capacity-building-stage-1-report/>

³³ <http://www.canterbury.nsw.gov.au/files/43a9c870-3ac2-4dbb-9a7c-a2620119a122/contrib-plan.pdf>

³⁴ <https://www.afr.com/property/residential/mirvac-wins-right-to-develop--australian-turf-clubs-canterbury-park-racecourse-land-20170816-qxx78i>

³⁵ <https://www.sydneymetro.info/sites/default/files/document-library/Sydenham%20to%20Bankstown%20Environmental%20Impact%20Statement%20Overview.pdf>

mature trees. It is unclear what process Metro is going through to consult with relevant Councils about the impact on Council owned trees and vegetation.

Environmental assessment of Metro Southwest

The biodiversity assessment³⁶ of the Metro Southwest corridor contains gaps and lacks the granularity necessary to capture the type and quality of native vegetation. The biodiversity assessment also appears to be internally inconsistent noting that the rail corridor includes 'small isolated patches of remnant or regrowth native vegetation' (p42) while the project area is 'confidently identified as planted, rather than regrowth or remnant vegetation' (p87).

The project area includes existing stations and it is possible to stand at any station along the corridor and spot regrowth, and occasionally remnant vegetation. For example Hurlstone Park station has a small patch of Coral Fern (*Gleichenia Dicarpa*) clinging to the northside cliff face while Dulwich Hill station has a stand of heavily pruned She Oaks (*Casuarina Glauca*). Doug Benson in his 1999 book; *Missing Jigsaw Pieces - the plants of the Cooks River Valley*, (a work absent from Technical Paper 9 references) identifies and includes photos of remnant Turpentine (*Syncarpia Glomulifera*) and Blackthorn (*Bursaria Spinosa*) at Hurlstone Park station (p41)³⁷. Looking up and down the rail corridor there are many additional examples of remnant or regrowth vegetation included in the 'exotic grassland' or 'exotic scrub or forest' categories used in the Biodiversity assessment report maps. The SBA also points out that planted vegetation is still useful habitat that contributes to biodiversity.

Isolated patches of native vegetation are often dismissed as too small to matter yet the SBA sees them as a vital part of the urban mosaic forming habitat stepping stones³⁸ in a dense urban environment. The stepping stones concept is also recognized in regional areas through the importance of paddock trees and the contribution they make to the environment³⁹. Habitat stepping stones are arguably at least if not more important in urban areas.

Replacement trees and landscaping in the corridor

The Metro City & Southwest Conditions of Approval is silent on the issue of landscaping, stabilisation and revegetation along the corridor apart from tree replacement.

The Metro Landscape and Visual Impact Assessment⁴⁰ (see p200-203) states that there will be an overall reduction in landscape quality as trees will not be reinstated within the corridor and turf will replace other vegetation that is removed. Elsewhere, Metro Southwest has indicated that trees will be replaced within 500m of the corridor including on Council land.

More recent conversations with Metro Southwest indicate that it is yet to contract for the final design and landscaping of the corridor. At this time it remains unclear who will be conducting the detailed design process to confirm what will be replacing vegetation that is removed, when will this process be done and what input local residents have to the design process.

Trees

³⁶ https://majorprojects.accelo.com/public/6c6bc87b845ad1b612204f3b1d14cced/12_%20S2B%20EIS%20Vol%206%20Technical%20paper%209_%20Biodiversity%20assessment.pdf

³⁷ <http://cooksriver.org.au/missing-jigsaw-pieces-bushplants-cooks-river-valley/>

³⁸ <http://www.habitatsteppingstones.org.au>

³⁹ <http://www.environment.nsw.gov.au/resources/research/pt-paddock-trees.pdf>

⁴⁰ https://majorprojects.accelo.com/public/53014ffff37e55f22385dbc5bf1e6674/10_%20S2B%20EIS%20Vol%205%20Technical%20paper%207_%20Landscape%20and%20visual%20impact%20assessment.pdf

The two for one tree replacement specified in the Metro Southwest Conditions of Approval (COA) applies to all trees over 3m tall. A tree is defined by Australian Standard AS 4373-2007 as 'A long lived woody perennial plant growing to greater than (or usually greater than) three metres in height, with one or relatively few main stems or trunks'. While replacement trees will have a minimum pot size of 75 litres this can be varied as agreed with the relevant Council.

The SBA suggests that the tree replacement ratio could be much higher given the many years it will take for them to grow to 3m or higher at maturity and recent NSW Government recognition of the importance of urban trees⁴¹.

De-vegetation and Corridor Management until 2024

Sydney Trains currently manages the rail corridor, including operations and maintenance of rail infrastructure, corridor and assets. Handover of the corridor to Sydney Metro will not happen until closer to final conversion works prior to Sydney Metro City & Southwest services beginning in 2024.

During this four-year period there is a significant grey area where trees removed by Sydney Trains do not need to be replaced yet those removed by Metro do. For example in September 2019 Metro Southwest is undertaking 'De-vegetation and tree clearing as required' (September Metro Upgrade notification to residents) while Sydney Trains will continue to undertake 'vegetation maintenance' (Sydney Trains Sydneyham to Campsie notification of track maintenance 28-30 September 2019).

This overlap or gap in accountability will make it difficult to assess whether any trees removed over the next four years are being replaced or not.

Landscaping

Metro Southwest has recently indicated it will landscape the corridor in accordance with relevant standards and guidelines yet without specifying which standards and guidelines. The only firm information made public to date is the Metro Landscape and Visual Impact Assessment (Turf and no trees in the corridor) and a lack of commitment to improving biodiversity (described below).

The relevant standards and guidelines Metro Southwest should look to include the Office of Environment and Heritage conservation management notes on Corridors and Connectivity⁴², and the Sydney Trains Guide to Vegetation Management in the Rail Corridor⁴³. The Sydney Trains Vegetation Management Guide is particularly useful as it spells out the value of replacing weeds and exotic vegetation with natives as the natives are easier and cheaper to maintain while also being aesthetically pleasing.

Missed opportunity to establish a biodiversity corridor and impact of fencing

The PIR main report considers and rejects improving disturbed areas of the rail corridor to improve biodiversity:

"With the retaining of vegetation and revegetation proposed as part of the preferred project, the use of the rail corridor as a biodiversity corridor is considered to be maintained to a level which is consistent with the existing corridor." (5.145).

⁴¹ <https://www.smh.com.au/politics/nsw/sydney-to-be-cooled-by-an-extra-five-million-trees-by-2030-20180411-p4z8x7.html>

⁴² <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Conservation-management-notes/corridors-connectivity-conservation-management-notes-110657.pdf>

⁴³ https://railsafe.org.au/_data/assets/pdf_file/0007/31696/EMS-06-GD-0067-Vegetation-Management-in-the-Corridor.pdf

What is interesting is the Minister for Planning's December 2018 Conditions of Approval which state, at E57 Station Design and Precinct Plans section c. Landscaping, that plans must include:

“(i) areas of vegetation to be retained and proposed planting and seeding details, including the use of local indigenous species for revegetation activities, (ii) details of strategies to rehabilitate, regenerate or revegetate disturbed areas and successfully establish and maintain the resulting new landscape.”⁴⁴

If native landscaping for all vegetation at Stations is a requirement then the lack of vision for the overall corridor is especially frustrating. This frustration is compounded by the Greater Sydney Commission (GSC) South District plan's intent to 'protect and enhance biodiversity by supporting landscape scale biodiversity conservation and the restoration of bushland corridors' (p89)⁴⁵. Given that the Metro Southwest project footprint is identified in Technical Paper 9 as 69 hectares with 39 hectares of vegetation cleared there is a major opportunity to make a contribution to biodiversity at scale.

Landscape scale biodiversity conservation is an approach that the GSC is actively supporting in Western Sydney with the Badgerys Creek Airport where Greening Australia's grassy groundcover restoration work⁴⁶ is written into the project as part of the environmental requirements. Greening Australia is successfully advocating for the novel application of complex groundcover in areas such as road, rail, water and utilities corridors. If it's already happening in Western Sydney then why is it not also under consideration as part of the Metro?

A similar process could be followed along the rail corridor without comprising access, safety or sight lines that would also link with the Greenway⁴⁷ which is promoted for its contribution to biodiversity in a highly urbanised area. The Greater Sydney Commission has identified the GreenWay as the no. 1 priority Green Grid project in the Eastern Sydney District Plan.

Fencing

A related biodiversity loss is the proposed 2.4 to 2.7m high fine mesh security fencing being installed along the 13.5 km length of the Sydenham to Bankstown corridor. The fine mesh will impede the movement of native animals by creating a barrier for small birds, reptiles, marsupials and frogs. This significant impact has not been considered in Metro Southwest plans and makes the PIR statement that biodiversity will at least be maintained impossible to achieve without modifying the fence design.

If the Metro trains had drivers then the new second fence would not be required as the existing boundary fencing meets safety requirements.

Removal of Vegetation/Loss of Biodiversity

- The biodiversity assessment was undertaken on the assumption that all vegetation within the rail corridor would need to be removed, with the exception of areas of threatened species of Downey Wattle that are located in the rail corridor between Punchbowl & Bankstown.
- Potential 13.8 hectares of vegetation, including mature trees will be removed along the banks & rail lines to be replaced by security fence up to 2.4 m in height for the full length of the line.”

⁴⁴ <https://majorprojects.accelo.com/public/4bea4c8a912bf2e24cd9e566d16138ee/Sydney%20Metro%20-%20Sydenham%20to%20Bankstown%20-%20Signed%20Instrument%20of%20Approval.pdf>

⁴⁵ <https://www.greater.sydney/draft-south-district-plan>

⁴⁶ <https://www.greeningaustralia.org.au/project/grassy-groundcover-restoration>

⁴⁷ <https://www.greenway.org.au/biodiversity>

- The number of trees that need to be removed has been reduced from 893 to 503 trees (native & exotic), which will still create a great loss of canopy, biodiversity & impact on wildlife substantially.
- The area around Marrickville station is lacking in trees & any tree removals will have a significant impact on the existing sense of place.
- Existing valuable canopy trees should be retained because it takes decades to establish good tree cover.
- The final number of trees needing to be trimmed or removed is still to be confirmed during detailed design and final construction planning. Replacement trees need to be advanced specimens not tube stock.
- It is unfortunate that tree replacement will be done outside the corridor.
- There are so few well established trees in this area the decision to remove so many trees should be reviewed as replacement trees take many years to be established

Sustainability & Climate Change

- Preferred Project states that the majority of initiatives & targets are retained, however due to the revised scope around active transport & drainage design the following would only be considered where relevant & feasible: water sensitive urban design, inclusion of renewable energy sources & assessing & mitigating climate change.
- Surely all of the above factors should be mandatory for all aspects of the project.
- Climate variables identified in EIS included annual rainfall, extreme rainfall, extreme temperature, extreme wind, storms (cyclones, hail, dust and lightning) sea level rise and fire danger.
- All of the above variables have the potential to impact in the form of increase costs.
- Project needs to appropriately manage impacts of Climate Change & severe weather events on construction & project infrastructure functioning.
- SCC4 The need for climate change risk treatments would be assessed & incorporated into the detailed design, where required. N.B Flood modelling removed-surely climate change risks should have underpinned the project!
- SCC11 Climate Change risks states “Periodic reviews of climate change risks to be carried out to ensure ongoing resilience to the impacts of climate change.” Which indicates a “wait & see, reactionary model rather than a pro-active risk assessment for the PP.

Hydrology & Flooding

- Preferred Project is retaining existing infrastructure where possible & minimising the extent of corridor works. It will not deliver new track drainage, modifications to cross drainage & new retention basins which it claims will not result in worsening of existing flooding or flood hazard within the surrounding rail corridor.
- The loss of precious open space in McNeilly Park for a retention basin was of great concern to the community, however alternative storm water & flood mitigation must be addressed.
- FHW! All flooding strategies removed
- Sydney Water (7.2.2) advised that “The project should address in detail the existing flood risk & anticipated flood management system requirements to service future catchment conditions” and that “Flood management should not rely on existing informal storage.”

- The PP response is that the PP would be operated within the current hydrological environment & that further assessment works were no longer relevant & that no further modelling or assessment is proposed as part of detailed design Why?
- No flooding works are proposed for Marrickville Station
- 7.10.13 Marrickville Council concerned that information provided in EIS in relation to flooding is “scant & lacks specific detail as to the measures proposed to address flood mitigation in Inner West LGA.”
- Marrickville Valley Flood Study 2013 categorised Marrickville & Sydenham Railways stations as High Hazard areas in the 1% AEP event.
- Evidence of this was seen after heavy rain in April 2015 when the station was inundated by run off and flowed along the tracks at Marrickville Station.
- Study confirms that existing pit inlets do not provide sufficient capacity to convey storm flows into the main box culvert.
- EIS acknowledges high hazard area around Canterbury station but modelling of flooding was not undertaken.
- No Flood modelling outside the Marrickville Valley, which for a project this size is unacceptable.
- Predicted increase in rainfall intensity & extreme events affecting stations & surrounds requires that a flood management system is designed now so that residual flood risk to people & property is socially acceptable.
- Preferred Project must address current or potential impacts it may have on social & economic costs to the community as consequences of flooding along the line.

Greenhouse Gas Emissions

- The annual electricity consumption during operation is estimated to be 86,576 tonnes of CO2 equivalent.
- Operation & maintenance would result in increased emissions of greenhouse gas as a result of increased use. This is not how we should be planning for the future as all new projects should be designed to reduce Carbon emissions.
- The EIS states that the “Project has the potential to reduce greenhouse emissions by providing a comfortable & efficient alternative to private car travel” however this cannot be assumed as a definite outcome as other factors such as fare increases & discomfort of standing long distances in very close proximity to other commuters may encourage car use.
- 5.52 Alternative Energy provision at stations – The Preferred Project offers less opportunities for the inclusion of renewable energy sources, however the inclusion of solar photovoltaic would be incorporated in the detailed design of stations where feasible – why not make this mandatory?
- Recommendation that sustainable initiatives must be reviewed & updated & relevant initiatives implemented including the use of renewable energy to minimise greenhouse gas emissions.

Heritage Impacts

Summary of Concerns

The Sydenham to Bankstown Metro conversion and the Sydenham to Bankstown Urban Renewal Corridor Strategy (SBURS) are likely to have significant heritage impacts. The original project, as described in the Environmental Impact Statement (2017) failed to apply best practice to heritage assessments in the corridor or planned treatment of railway heritage in the project area. The Sydenham to Bankstown corridor is rich with built and cultural heritage, and the project abuts several heritage items and current or draft

heritage conservation areas. By being aligned with the SBURCS the Metro conversion would result in loss of heritage and character. The NSW government has underestimated expert concerns about heritage destruction in relation to this project.

Despite the NSW Government revising heritage impacts in the Preferred Infrastructure Report (PIR) (2018) the conversion of the Sydenham to Bankstown line will reestablish pressure to increase development opportunities along the corridor.

As that there is an existing rail line in the corridor a project to convert this line lacks the social licence to proceed and is not in the public interest.

Detailed submission

The original project, as described in the Environmental Impact Statement (2017) failed to apply best practice to heritage assessments in the corridor or planned treatment of railway heritage in the project area. The Sydenham-Bankstown line is around 100 years old, and still functions well, like many similar lines across NSW. All stations are heritage-listed locally (with the councils and RailCorp). Local heritage listing follows a process that determines the importance (cultural, social, historical, aesthetic etc) of an item or group of items to the local community. The NSW Department of Planning, Industry and Environment states: *“Local heritage values need greater recognition and we need to work closely with local government and communities to ensure this happens”*.⁴⁸

Particular stations such as Marrickville, Canterbury and Belmore are State Heritage listed. State listing requires a greater degree of heritage importance be demonstrated. Again, according to the NSW Department of Planning, Industry and Environment, *“The State Heritage Register lists our State's most significant heritage places and objects known as items of state heritage significance.”*⁴⁹

Despite the government's rhetoric about the value of heritage, the original plan for the Metro project would have meant several stations losing their heritage listings as well as the loss of historic platforms, ticket offices and platform buildings.⁵⁰

This corridor is rich with built and cultural heritage, and the project abuts, or is close to, several heritage items and current or draft heritage conservation areas

The suburbs of Dulwich Hill, Marrickville, Hurlstone Park, Belmore, and Canterbury have significant built and cultural history, documented in State and council heritage listings, heritage conservation areas and also National Trust assessments (the latter were ignored in the Heritage Assessment for the EIS and no new assessments were performed).

It is obvious that heritage assessments for the corridor are outdated and incomplete. Recent formal heritage assessments in the small suburb of Hurlstone Park, for example, have identified new heritage items and recommended wide Heritage Conservation Areas, some of which about the railway station, part of the project area.⁵¹

⁴⁸ <https://www.environment.nsw.gov.au/topics/heritage/heritage-near-me>, accessed 5/9/2019.

⁴⁹ <https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/HeritageListing2010final.pdf>, Accessed 5/9/2019.

⁵⁰ Sydney Metro City & Southwest -Sydenham to Bankstown; Technical Paper 3; Non-Aboriginal Heritage Impact Assessment; Report to Transport for NSW; August 2017; see particularly p 149-150 Table 21 “Justification of Heritage Impacts”

⁵¹ Hurlstone Park Heritage Assessment, Stage 1 Report, 2016 for Canterbury-Bankstown Council; Review of the Hurlstone Park Heritage Planning Proposal 2019.

This project is aligned with the unpopular Sydenham to Bankstown Urban Renewal Strategy (SBURCS) which inherently, through re-zoning, equates to the demolition of built heritage

Heritage destruction is embedded in the Metro plans. The Metro is linked to urban renewal and development. Indeed one of the objectives of the Metro is to act as a catalyst for growth. The Metro is being used as a mechanism to force high-density, poor quality development onto low-density, established, heritage-rich and vibrant neighbourhoods. While ever the metro strategy exists there will be speculative development pressure on the corridor.

Previously, The SBURCS plans were applied indiscriminately across the corridor, with mass re-zonings recommended regardless of heritage values. Minimal and inadequate heritage studies were undertaken as part of the urban renewal plans. The urban renewal plans were widely criticised by communities along the established suburbs and have since been revised. The NSW government, however, remains determined to push growth, development and the Metro.

The Dept of Planning were forced to hand back planning to Councils. However the corridor is still identified in the Eastern City District Plan for “transit orientated development.”

The Sydenham-Bankstown corridor, already one of the most densely- populated in Sydney (according to the Dept of Planning in the draft Urban Renewal Strategy), has already had its fair share of growth. According to a recent analysis by economist Terry Rawnsley from SGS Economics and Planning tracked, this corridor is one of the top 5 of Sydney districts that have absorbed well over half of the city’s growth in the last 2 decades.⁵²

While it is understandable that growth is triggered in areas where new public transport projects are developed, it should not be expected that established suburbs, with existing transport, that are already congested , with full schools and hospitals, and heritage-rich precincts, should have further growth forced upon them.

The existing subdivision patterns and street networks underpin the history and character of this corridor and Sydney’s long-established suburbs.

The concern is that were previously the Metro went hand-in-hand with the overdevelopment it will now be a trojan horse for overdevelopment.

Conclusion

This project is inherently flawed, has been incorrectly attributed to a heritage-rich, already dense corridor and that has a functioning historic heavy rail line; it lacks the social licence to proceed and is not in the public interest. The supposed benefits such as accessibility improvements can be achieved without a Metro conversion, and can be designed to fit in with heritage stations.

⁵² Sydney Morning Herald, 8 Aug 2019, <https://www.smh.com.au/national/nsw/the-sydney-suburbs-bearing-the-brunt-of-a-20-year-population-boom-20190906-p52oud.html>, accessed 9/9/2019.

g) Any lobbying, political donations or other influence of the public or private sector in relation to making that decision

It appears that lobbyists groups such as Committee for Sydney, Urban Taskforce, Property Council of NSW and Planning Institute of Australia all actively lobbied for the SW Metro as a means to act as a catalyst for development within a 400 to 800 metre radius of each of the railway stations in the corridor.

From a perusal of the submissions made to the Department of Planning and NSW Transport dating as early as 2015 these various organisations extolled the virtues of a metro and linked it to high rise development within the corridor in terms of urban renewal – notwithstanding that the terms urban renewal was totally incorrect and that it was more a case of densification on a scale never seen in the history of this country.

It appears from various submissions made (prior to the release of the EIS for the Metro project in 2017) the premise for support clearly falls within the property development opportunities and recreating the business model of MTR in Hong Kong, Singapore and China whereby fortress like towers are built around the Metro stations creating the patronage for a successful business model.

h) The tender process for appointing private operators

The community is still none the wiser about what the role of a private operator will be in the Sydenham to Bankstown corridor.

To date, the community has been mainly told (in the summary brochure accompanying the Preferred Infrastructure Report) that the:

- “Sydney Metro infrastructure, like the stations, trains and railway tracks are owned by the NSW Government”; and
- “Sydney Metro uses Opal ticketing and fares are set by the NSW Government, the same as the rest of the Sydney public transport network”.

This raises the question as to whether there is any need for a private operator in this corridor, particularly given the corridor is currently owned by Sydney Trains.

The reference to Opal ticketing is interesting, in that it leaves the door open for Opal ticket prices to be higher in the Sydenham to Bankstown corridor compared to other parts of the Sydney Trains network. A commitment from the government that ticket prices in the corridor will be the same for the rest of the network would be welcome.

It should also be noted that the NSW Government, as outlined in the original 2017 EIS below, was predicting massive increases in station usage, largely as a result of the now defunct urban renewal strategy (note for instance that Hurlstone Park’s daily station entries were proposed to increase by more than three times from 1,532 to 4,700 in just ten years).

Table 11.3 Existing and forecast station travel volumes¹

Station	2016		2026 ²	
	Entry	Exit	Entry	Exit
Marrickville	4,594	4,356	6,900	6,900
Dulwich Hill	2,706	2,464	6,800	6,800
Hurlstone Park	1,532	1,312	4,700	4,700
Canterbury	2,426	2,164	7,100	7,100
Campsie	8,237	8,039	10,700	10,700
Belmore	3,025	2,847	6,500	6,500
Lakemba	4,302	4,130	7,400	7,400
Wiley Park	2,006	1,806	5,700	5,700
Punchbowl	2,935	2,806	6,500	6,500
Bankstown	8,993	9,350	11,900	11,900

Notes: 1. Data provided by Transport for NSW.

2. The entry/exit figures for 2026 are derived from modelled data using a method of mirroring the AM period in the PM. This results in symmetrical entry and exit forecasts but does not account for the altered journey chains undertaken by a minority of users. Numbers in table are volumes for metro services only.

Given the urban strategy has been scrapped, it appears unlikely that these major patronage increases would be met, although no updated figures have been published. This raises the question as to how the NSW Government would attract interest from a private operator.

i) The contractual arrangements entered into in respect of the project

It is apparent that the tender process and contractual arrangements entered into for the Metro Southwest are a different model to those entered into for the design and construction of the Metro NorthWest.

The Metro Northwest was awarded as a single package for construction and design whereas the Metro Southwest contracts are being awarded across a range of contractors and over a period of time.

The funding arrangements for the Metro Southwest are clouded in secrecy and subject to non disclosure of actual budget line item allocations in the successive NSW State Budget Papers for the following financial years ended :

- 30 June 2018,
- 30 June 2019 and
- 30 June 2020 respectively

It is to be noted that City and South West Metro is included as one line items for each of the abovementioned financial year budget disclosures.

The contractual arrangements for each of the tenders awarded have been confidential. The tender dollar amount for some of the contracts awarded for the SW Metro have also been withheld.

The public is none the wiser regarding the actual cost of the SW Metro and have a right to be concerned about the role of NSW Treasury in approving such a project with no disclosure of the actual cost. The Minister for Transport, Andrew Constance has only said it will cost less than \$1 billion. Why the government will not release the actual cost of the SW Metro remains of serious concern in terms of public accountability and transparency.

j) The adequacy of temporary transport arrangements during the conversion process, including for people with a disability

Late release of Temporary Transport Plan

Sydney Metro announced in February 2017 that the Temporary Transport Plan (TTP)⁵³ for the Sydenham to Bankstown Metro would be released several years before the shutdown of the T3 Bankstown Line. It said, “A temporary transport plan will be put in place during possessions. This plan will be released to the community several years beforehand” – Sydney Metro City & Southwest February 2017 Project Update⁵⁴ However, by August 2019, this had not happened.

The Temporary Transport Strategy (a document with seniority to the Temporary Transport Plan [TTP]) obtained under GIPA stated: “TTP 1 will be released to the community in 2018. Community and stakeholder input will be invited at that time, and will be carefully considered as we refine and finalise this first TTP, ready for implementation” – Sydenham to Bankstown Temporary Transport Strategy (Page 31)⁵⁵

In July 2019, Save T3 Bankstown Line co-convenor Roydon Ng lodged a complaint with Sydney Metro about their failure to release the TTP. After refusal and then mediation Sydney Metro still refused to release the TTP.

The official Temporary Transport Plan was released publicly on 6 September 2019. However, this plan only covers the shutdown of the T3 and T4 lines in late 2019 and early 2020, but not all shutdowns across the project construction period (including the final six month shutdown expected in 2024).

Not only was the release of TTP significantly delayed, its inadequacies extended to its failure to cover the proposed alternative transport arrangements for commuters across the entire construction period.

There should be community consultation on Temporary Transport Plans

The Temporary Transport Strategy document mentions that community and stakeholder input would be sought in 2018 for in working towards finalising the Temporary Transport Plan. However, no dedicated public consultation for the Temporary Transport Plan had taken place whatsoever before the release of the official plan on 6 September 2019.

Transport for NSW Coordinator General Marg Prendergast told the Canterbury-Bankstown Express on 22 July 2019 in an article titled “Bankstown braces for travel chaos when trains stop for Christmas holidays”, that “Final transport plans will be shared with the community well in advance of any shutdown.”⁵⁶

It also appears the local councils have not been consulted regarding the Temporary Transport Plan with Inner West Council indicating in a response to a GIPA request⁵⁷ that it is “unable to confirm whether Transport for NSW intends to place the strategy documents

⁵³ The Temporary Transport Plan

http://data.mysydney.nsw.gov.au/documents/MET028C_TTP---+Information+Brox+BAU+Version+v10.pdf

⁵⁴ See page 31 at [https://www.sydneymetro.info/sites/default/files/document-](https://www.sydneymetro.info/sites/default/files/document-library/City%20and%20Southwest%20Project%20Overview%20Update%20February%202017_1.pdf)

[library/City%20and%20Southwest%20Project%20Overview%20Update%20February%202017_1.pdf](https://www.sydneymetro.info/sites/default/files/document-library/City%20and%20Southwest%20Project%20Overview%20Update%20February%202017_1.pdf)

⁵⁵ <https://restoreinnerwestline.org.au/wp-content/uploads/2018/10/02-Temporary-Transport-Strategy-3008175.pdf>

⁵⁶ https://www.dailytelegraph.com.au/subscriber/news/1/?sourceCode=DTWEB_WRE170_a&dest=https%3A%2F%2Fwww.dailytelegraph.com.au%2Fnewslocal%2Fthe-express%2Fbuses-to-replace-trains-on-bankstown-line-during-christmas-holidays%2Fnews-story%2F696b91d04d40454462cae95964fe033f&memtype=anonymous&mode=premium

⁵⁷ REQ2019-054761

on exhibition to affect Councils, businesses and members of the public to comment. Canterbury-Bankstown Council, also in response to a GIPA request (1/20) has indicated that they have not been involved in with the Temporary Transport Plan

Extraordinarily, the only consultation that has been conducted since the release of the Temporary Transport Plan has been in regard to parking changes outside train stations. Even these have not been widely advertised in the local community. Given the TTP was made public on 6 September, the 23 September deadline for comments on parking changes illustrates the problem.

Freedom of Information GIPA Campaign

Beginning in June 2018, Save T3 Bankstown Line convenor Roydon Ng made a number of attempts under GIPA to obtain the Temporary Transport Plan. On four occasions between June 2018 and September 2019, Transport for NSW decided that the GIPA request for the Temporary Transport Plan was “invalid”. The requests for the information payment of processing fees some by TV station Channel 9, some by crowd-funding and some by Roydon Ng. Transport for NSW deemed the TTP was not of “public interest”.

Further reasons for not publishing the TTP were a “delayed response from business [Sydney Metro] ...” and “the Christmas shutdown”.

It was only after involving Channel 9 News Sydney in 2018, that Transport for NSW reluctantly admitted that this GIPA could be processed.

On 4 September 2019, Sydney Metro released 45 pages of documents to Roydon Ng regarding the Temporary Transport Plan, but only the first 7 pages contained new information, with the remaining pages the same material released in GIPA to Channel 9 News Sydney in 2018

Transport for NSW/Sydney Metro has abused the spirit of GIPA through imposing processing fees on what is of high public interest and significance as 100,000 commuters will be forced onto buses during the shutdown of the Bankstown Line.⁵⁸

Cancellation of Walking and Cycling Strategy

The Sydenham to Bankstown Walking and Cycling Strategy has been cancelled by Sydney Metro and has not been included in the Temporary Transport Plan or the project going forward

This will undoubtedly have a negative impact on local traffic and worsen congestion in the Inner West and Canterbury-Bankstown

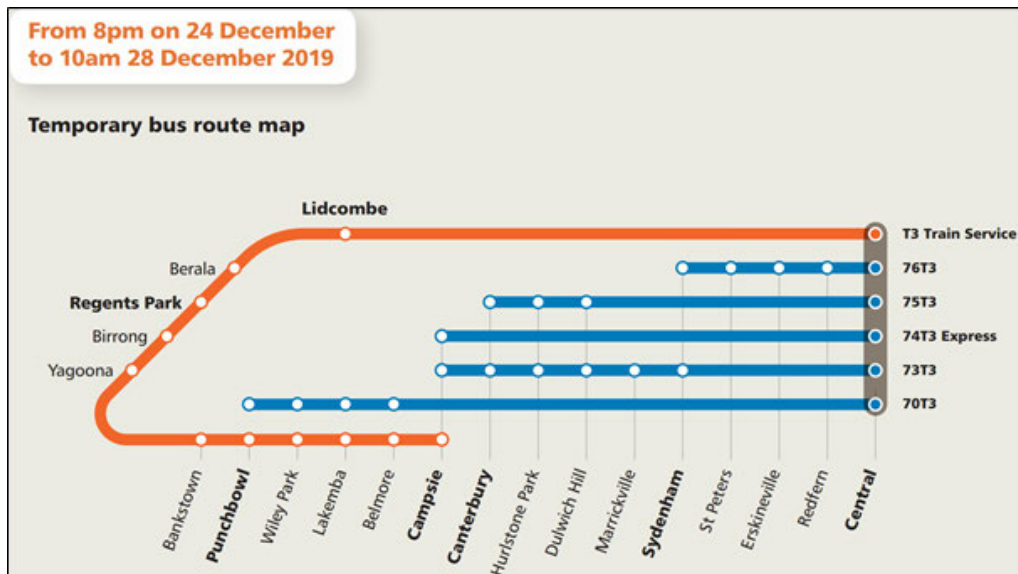
Inadequacy of Temporary Transport Arrangements

The Temporary Transport Plan released on 6 September 2019 raises a number of issues including:

- The loss of direct services between Liverpool and Bankstown

⁵⁸ <https://www.smh.com.au/national/nsw/rail-line-closures-to-force-100-000-commuters-a-day-to-catch-buses-20190718-p528eg.html>

- The lack of replacement bus services at Bankstown station
- The question of whether adequate street space exists for such a large number of buses outside stations such as Sydenham and Central



Temporary Transport Plan⁵⁹

Impact on other lines

Transport for NSW has also failed to explain why Central to Hurstville on the T4 Illawarra Line is being shut down as well...

The Temporary Transport Plan also fails to cater for regional trains with NSWTrainLink services to southern NSW, Canberra and Melbourne all impacted by the closure between Central and Sydenham

“Homebush bottleneck” also a hoax

Another major feature of the T3 Train Service from Central to Campsie via Lidcombe is that it travels along what was the former Inner West Line (to Regents Park) and Bankstown Loop

The NSW Government claimed in 2013 that there was insufficient track capacity for T3 Bankstown trains between Homebush and Lidcombe (“Homebush bottleneck”), and used this as the basis for removing the Inner West Line’s City to Liverpool (& Bankstown loop) via Regents Park service

The Temporary Transport Plan is further proof that the NSW Government lied about the track capacity issue at the “Homebush bottleneck” in 2013 just as the NSW Government is continuing to spread propaganda about the “Bankstown bottleneck”

⁵⁹ http://data.mysydney.nsw.gov.au/documents/MET028C_TTP+-+Information+Brox+BAU+Version+v10.pdf

T3 Trains terminating at Central

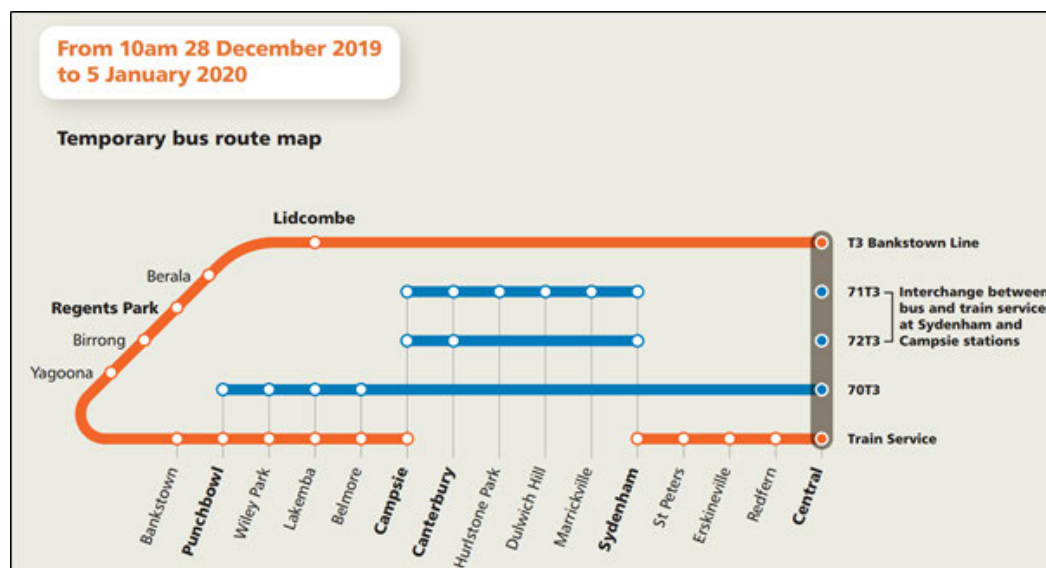
It is also inadequate that the T3 and T2 Line during the shutdown appears to terminate at Central and not continue around the City Circle

No T3 Trains beyond Birrong

Another inadequacy of the Temporary Transport Plan is the lack of information regarding stations between Birrong and Liverpool on the T3 Bankstown Line

It appears that the government does not want to acknowledge that the T3 Bankstown Line currently services all stations from Bankstown to Liverpool

The map also does not explain what a station name that is in bold means and assuming it means an interchange, there is a lack of information explaining why Regents Park is in bold.



Temporary Transport Plan⁶⁰

Bus routes

The lack of replacement bus services in the later part of the shutdown from Campsie, Canterbury, Hurlstone Park, Dulwich Hill, Marrickville, Sydenham to Central is concerning

Replacement buses finishing at Central also increases interchange at Central station as the existing T3 Bankstown Line provides direct access to City Circle station such as Town Hall, Wynyard, Circular Quay, St James, Museum

⁶⁰ http://data.mysydney.nsw.gov.au/documents/MET028C_TTP+-+Information+Brox+BAU+Version+v10.pdf

It is also concerning that replacement buses (from between Punchbowl to Sydenham) do not include a stop at Redfern station

Public transport network unable to cope with demand

In recent years, there has also been Inner West Light Rail trackwork during the Christmas and New Year period which also requires replacement buses at central station, there may not be enough space for both Inner West Light Rail and Bankstown Line replacement buses

Shutting down the Bankstown Line during New Year's Eve will undoubtedly cause serious delays no matter how many buses the government promises to operate for the special event

Local roads are already at capacity, especially during peak hour and without major widening are not able to cater for an easy flow of existing traffic along with replacement bus services

Traffic congestion from increased buses on roads

Major traffic congestion will be the result of the shutdown of the Bankstown Line in order for it to be downgraded in Sydney Metro Southwest. This video of a bus turning left from Beamish Street into South Parade in Campsie on 22 July 2019 at 6pm⁶¹ illustrates the point.

The increased travel times and increased traffic congestion in the Inner West and Canterbury-Bankstown is highly avoidable as the downgrading of Sydenham to Bankstown into Metro is completely unnecessary.

The NSW Government has also failed to release information regarding the actual routes that buses will take during the shutdown of the Bankstown Line.

Accessibility Issues with Temporary Transport Arrangements

As acknowledged by Transport Minister Andrew Constance during Budget Estimates on 30 August 2019 and in the Temporary Transport Plan released on 6 September 2019, not all buses replacing train services between Punchbowl and Central will be accessible

This is a significant downgrade of public transport as all current train services are accessible to persons with a disability or requiring wheelchair access

The replacement buses for the Bankstown Line shutdown also appear to be inferior to the brand new "StationLink" buses used to replace trains between Epping and Chatswood during the construction of Sydney Metro Northwest

Every "StationLink" bus running between Epping and Chatswood was an accessible service and it is appalling to see South West Sydney being treated as second-class citizens

Suburban bus stop locations outside or nearby to train stations are also not suited for large crowds on the narrow footpath, which adds difficulty to the travelling experience for persons with a disability

⁶¹ <https://twitter.com/SaveT3Bankstown/status/1153236361677139970>

Stations between Punchbowl and Central do not have the luxury of wide footpaths and waiting areas available at Epping to Chatswood line stations

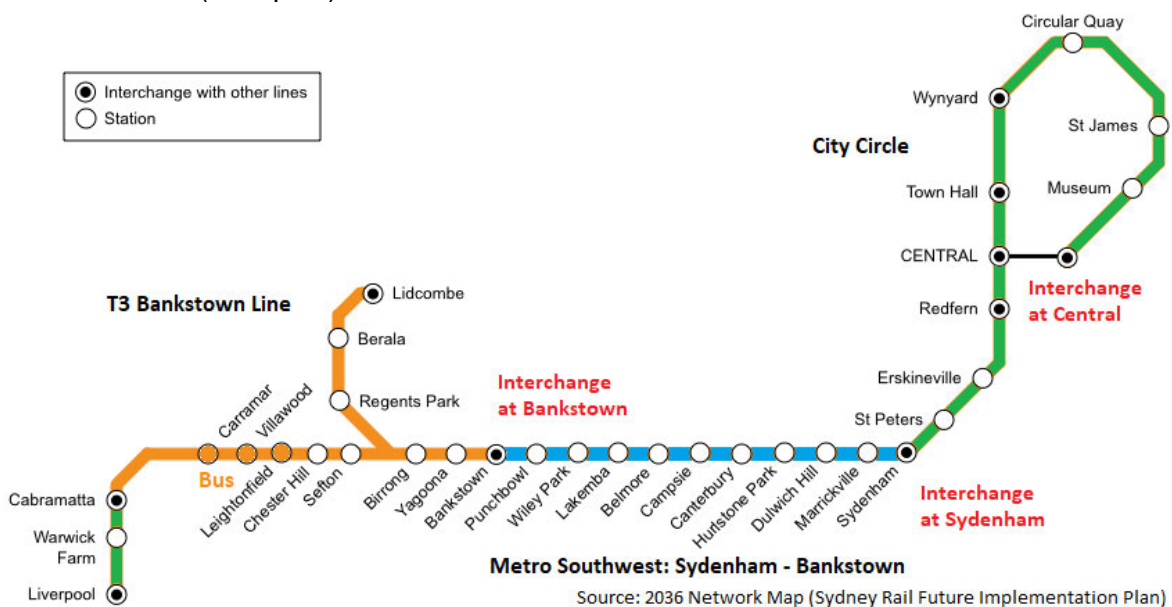
k) The impact on the stations west of Bankstown

Sydenham to Bankstown is not the Bankstown Line

Sydney Metro regularly refers to Metro Southwest (Sydenham to Bankstown) as the “Bankstown Line”. However, this disguises the existence of T3 Bankstown Line stations west of Bankstown. Passengers using these stations will be adversely affected by the Metro during construction and when operating.

There are fourteen stations to the West of Bankstown (and Local Government Area) that will be negatively impacted. They are:

- Lidcombe (Cumberland)
- Berala (Cumberland)
- Regents Park (Cumberland/ Canterbury-Bankstown)
- Birrong (Canterbury-Bankstown)
- Yagoona (Canterbury-Bankstown)
- Sefton (Canterbury-Bankstown)
- Chester Hill (Cumberland/ Canterbury-Bankstown)
- Leightonfield (Canterbury-Bankstown)
- Villawood (Canterbury-Bankstown)
- Carramar (Fairfield)
- Cabramatta (Fairfield)
- Warwick Farm (Liverpool)
- Liverpool (Liverpool)
- Casula (Liverpool)



- **T3 Bankstown Line (Lidcombe – Bankstown – Cabramatta) operated by Sydney Trains**
- **Sydney Metro Southwest: Sydenham to Bankstown**
- **East of Sydenham (T4 Illawarra Line or T8 South Line) and City Circle operated by Sydney Trains**

T3 Bankstown Line cut off

The Western side of the T3 Bankstown Line, will be cut off. 19,000 commuters will lose their direct train to the City. For the first time in the history of the Sydney Trains network, an additional 19,000 commuters will have to interchange every day at either Lidcombe, Bankstown, Cabramatta, and possibly Birrong.

Former rail executives John Brew, Ron Christie, Bob O'Loughlin and Dick Day, have also warned that the removal of heavy rail on the T3 Bankstown Line will cause significant disruption and a reduction in reliability to the network.⁶²

Downgrading the T3 Bankstown Line into Metro removes the final direct train line to City for stations west of Bankstown, having already lost the Inner West Line (City to Liverpool via Regents Park and City to Bankstown via Regents Park) due to Gladys Berejiklian's 2013 timetable cuts.

A commuter from west of Bankstown, traveling along the current T3 route to the City Circle, will need to catch 3 separate trains and interchange at Bankstown and again at Sydenham or Central once the Sydenham to Bankstown line is downgraded to Metro.

The current design of Bankstown Station as an interchange between Sydney Trains and Sydney Metro will see commuters having to walk up to 400 metres between trains, as the Metro platforms will be on the eastern end of the station. This will increase travel times and make it even harder for less-mobile commuters to travel.

Travel Times to Increase by 17 minutes for South West Sydney⁶³

Liverpool and South West Sydney commuters can expect significant increases in travel times of 17 minutes as a result of downgrading the Sydenham to Bankstown to a Metro as the T3 Liverpool to City via Bankstown express train will be removed.

The "Sydney's Rail Future Implementation Plan" suggested a remedy to the increased travel times for Liverpool, Cabramatta, Warwick Farm, Casula commuters with the construction of additional tracks (tunnel from Croydon or Homebush to Granville) for the T1 Western Line. However plans to upgrade the Western Line with a tunnel from Croydon to Granville for the T1 Western Line were abandoned in 2013 with the WestConnex M4 tolls given priority investment in our railways.^{64 65}

The number of additional passengers boarding at other stations during the shutdown of the T3 Bankstown Line during construction of Metro Southwest⁶⁶

There will be a 20% passenger increase at Lidcombe, 10% passenger increase at Strathfield, double the number of passengers at Ashfield hourly during the morning peak. The impact on the T1 Western Line and T2 Inner West/Leppington will be severe. It should also be noted that the 2017 timetable removed express services to City from Lidcombe station.

⁶² <https://www.transport.nsw.gov.au/system/files/media/documents/2018/tra-000402.pdf>

⁶³ https://restoreinnerwestline.org.au/wp-content/uploads/2019/09/SRF_Implementation_Plan_Dec_2013.pdf P.202

⁶⁴ <http://cityhubsydney.com.au/2019/03/upgrade-dumped-for-westconnex-tolls/137857/>

⁶⁵ <https://restoreinnerwestline.org.au/wp-content/uploads/2019/09/Western-Line-upgrade-abandoned-to-increase-toll-revenue-on-M4-WestConnex-compressed.pdf>

⁶⁶ <https://restoreinnerwestline.org.au/wp-content/uploads/2018/10/07-Temporary-Transport-Plan-model-runs-presentation-of-key-results-2112175.pdf> P.5

I) Any related matter

Servicing St Peters and Erskineville Stations

The Government has committed to maintain the existing level of services from St Peters and Erskineville Stations, currently on the Bankstown Line (T3), between Sydenham and Redfern. Neither station will be serviced by the Sydenham to Bankstown Metro.

In order to maintain the services at St Peters and Erskineville additional trains can only come from either the T8 (Campbelltown) or T4 (Illawarra) lines. It is our understanding that the T8 is the preferred option for the provision of services to St Peters and Erskineville, though T8 may still be under consideration.

As per the current T3 peak hour timetable (between 7am and 9am) eleven T3 trains stop at Erskineville. Of these eleven trains, five also stop at St Peters. Another three T3 express trains service St Peters, but skip Erskineville.

While T4 services currently pass through St Peters and Erskineville (fig 1), they do not stop there. If the T4 is required to provide eight new peak hour services to St Peters and eleven new peak hour services to Erskineville the T4 service will be slowed down.

Unfortunately, the potential for increasing the number of trains servicing the T4 line is limited. During the current morning peak, T4 trains are scheduled to pass through Redfern, Central, Town Hall and Martin Place every 3 minutes. Even with significant improvement to T4 line signalling, the added requirement of servicing St Peters and Erskineville will guarantee that T4 commuters, south of St Peters, will have longer travel times.

The prospect of poorer services to current and future users of the T4 line and is one strong reason not to proceed with the conversion of the S2B line.

While the SBA understands that the T4 option is currently the preferred option, the potential to use the T8 line remains open to the Government. However, this is fraught with problems.

The Government has argued that the Metro will significantly reduce congestion on the City Circle by removing the T3 service. The option to replace the current T3 services to St Peters and Erskineville with T8 services would require the same number of trains using the City Circle as is currently the case. This would undermine one of the key benefits of the Metro proposed by the Government.

Further, it should be noted that the current St Peters Station timetable includes six T8 train services via Sydenham to St Peters during the peak. Whether these are retained, or shunted onto the T4 service once the Metro is built, remains to be seen.

In order to keep its commitment to maintain services to St Peters and Erskineville Stations the government has to choose between reducing the service level of the T4 line or undermining one of its key arguments in favour of the Metro.

The government needs to confirm its plans to use the T4 line to service St Peters and Erskineville once these stations are no longer being serviced by the Bankstown Line or outline alternatives for providing services to St Peters and Erskineville?

Students travelling to the University of Sydney

Exacerbating matters for the T4 as a replacement to the T3 service to St Peters and Erskineville is the University of Sydney. In 2015 the government made the decision not to build a station at the University, opting instead for Waterloo. This decision will have significant impacts on the travel arrangements for university students along the T3 line.

Currently, the T3 line services Redfern Station, the station closest to the University. This delivers students from almost the entire length of the T3 line to the station closest to the University. Once converted the T3 line will bypass Redfern Station.

Students coming from stations west of Sydenham and east of Bankstown will have to change trains at Sydenham to get a train to Redfern or stay on the Metro till Central, then catch a train back to Redfern. For those students to the west of Bankstown, they will have to change trains twice to access the University.

The implications for the T4 should be evident. A percentage of both sets of students are likely to change at Sydenham and catch T4 trains to Redfern. This will put further strains on the T4 line.

Reduced direct access for students to Sydney University is a major problem associated with the conversion of the T3 sydenham to Bankstown. The government needs to show how many students will use the T4 from Sydenham once the Sydenham to Bankstown section of the T3 line has been converted and what effect this will have on T4 services.

Lift access upgrades and station design

Lift access upgrades between Sydenham and Bankstown can and do happen as part of the established Transport Access Program (TAP) so Metro Southwest isn't a precondition for these improvements to occur.

Metro Southwest and the TAP have different 2019/20 NSW budget lines. Is the budget for lift upgrades being subsidised by existing transport programs (TAP) instead of being separated as part of the Metro Southwest budget and business case?

In September 2018 Thyssenkrupp were contracted to design, supply, install and maintain lifts before the Conditions of Approval for Metro Southwest station and precinct design were signed in December 2018 and well before the tender for station design was released in September 2019. How can a tender for station design be released when another company already has the contract to design, supply and install lifts?

10 September 2018

The NSW Government today announced Australia's biggest ever purchase of lifts and escalators as part of an \$87 million contract awarded by Sydney Metro – Australia's biggest public transport project.

Thyssenkrupp will design, supply, install and maintain about 70 lifts and 130 escalators for the extension of Sydney Metro from Chatswood into the city and beyond to the south west under a framework contract.

The conversion of the Bankstown line to metro standards means all 11 stations between Sydenham and Bankstown will have lifts – including Punchbowl, Wiley Park, Canterbury, Hurlstone Park and Dulwich Hill, which currently do not.⁶⁷

On 12 December 2018 the conditions of approval (CoA) for the station and precinct

⁶⁷ <https://www.transport.nsw.gov.au/news-and-events/media-releases/historic-lift-for-public-transport-accessibility-0>

designs for Sydenham to Bankstown were signed by the Minister for Planning.⁶⁸

The 2019/20 NSW Budget (p2-15) re-announced the lift upgrades to Punchbowl, Wiley Park, Canterbury, Hurlstone Park and Dulwich Hill as part of the existing Transport Access Program (TAP). The five station upgrades are tagged as part of the Metro Southwest yet Metro City and Southwest has its own budget line (p2-13) of \$5.3m over four years.⁶⁹

On 4 September 2019 the NSW Government invited tenders (FT ID SM 2019/015) for station and precinct design for nine Bankstown line stations to include:

1. Stations Structures, Platforms, Rooms and Buildings;
2. Station Services and Systems (including Metro CSR);
3. Metro Service Buildings;
4. Station Precincts; and
5. Fencing and Screens

Security Concerns

Commuters have expressed concern that there will be no driver or conductor on Metro and fear for commuter safety. The fact that commuters can see through the length of the carriage does not allay security fears. There is supposed to be CCTV however it is implied that commuters will be responsible for “active surveillance”

Security issues are still of concern to commuters regarding long distances underground and include “What happens if someone lights a fire while underground? (This has happened on North West Metro) What happens if the computer control system is hacked and customers are underground & locked inside? What happens when power black-outs occur? How would wheelchair customers be removed from a Metro without the guidance of on-board staff? What will happen in the event of racial abuse, fighting breaking out, aggressive behaviour from drug affected customers or terrorist threats/acts without trained on board staff?

- Monitoring of Metro at Tallarong is not of great comfort to a Bankstown Line commuter
- Docklands Light Rail in London is driverless but all trains have a conductor on board.
- Customer assistants are promised at every station and moving through the network during day and night” however with constant cuts to the rail network workforce, what guarantee can be given that this will be the case long term?
- Width of tunnels is a major security concern with Metro tunnels described as “Death Traps” Trapped people will not be able to get out of carriages through the side of the carriage and entering the line through the front or rear of the train could be fatal to many as following driverless trains travel at high speeds only minutes behind.

⁶⁸ <https://majorprojects.accelo.com/public/4bea4c8a912bf2e24cd9e566d16138ee/Sydney%20Metro%20-%20Sydenham%20to%20Bankstown%20-%20Signed%20Instrument%20of%20Approval.pdf>

⁶⁹ https://www.budget.nsw.gov.au/sites/default/files/budget-2019-06/2._Delivering%20our%20record%20infrastructure%20plan-BP2-Budget_201920..pdf

- Concerns expressed about personal safety for women. Sexual harassment is rife on Metros in Japan with a range of strategies being employed by women. Recent reports reveal these include "stabbing" wandering hand with safety pins. putting stickers on offenders or spraying offenders with "invisible sprays."
- Alternate transport arrangements will have the potential to result in noise & air quality impacts and for an increase in public safety risks due to the increase in vehicles on the road network.

